

STANDARD INSPECTION REPORT OF AN LNG FACILITY

A completed **Standard Inspection Report** is to be submitted to the Director within 60 days from completion of the inspection. A **Post Inspection Memorandum (PIM)** is to be completed and submitted to the Director within 30 days from the completion of the inspection, or series of inspections, and is to be filed as part of the **Standard Inspection Report**.

Inspection Report		Post Inspection Memorandum	
Inspector/Submit Date: Lex Vinsel/01/05/2012		Inspector/Submit Date:	January 5, 2012
		Sr. Eng Review/Date:	J. Subsits January 6, 2012
		Director Approval/Date:	
POST INSPECTION MEMORANDUM (PIM)			
Name of Operator:	Puget Sound Energy	OPID #:	22189
Name of Unit(s):	Gig Harbor LNG Satellite Plant	Unit #(s):	
Records Location:	Gig Harbor, WA	Activity #	
Unit Type & Commodity:	Satellite – Liquefied Natural Gas (LNG)		
Inspection Type:	Standard Inspection	Inspection Date(s):	October 24-27, 2011
PHMSA Representative(s):		AFO Days:	

Company System Maps (copies for Region Files):	
Validate SMART Data (components, miles, etc):	<input type="checkbox"/> Acquisition(s), Sale or New Construction (submit SMART update): <input type="checkbox"/>
Validate Additional Requirements Resulting From Waiver(s) or Special Permit(s):	

Summary:
 The Gig Harbor Liquefied Natural Gas (LNG) Satellite Plant consists of a truck transfer, storage, vaporizer, auxiliary power, control center, two 64,000 gallon storage tanks and two transport mobile tankers. During the winter months, the plant provides additional gas pressure for the Gig Harbor peninsula distribution area. Currently, the Peninsula is served by two 8-inch diameter high pressure gas mains from Des Moines via underwater crossing to Maury and Vashon Islands. LNG is transported to the facility using PSE tankers by a third party transporter.
 Also on site is a storage shelter, which houses PSE's Mobile LNG System. Provisions have been incorporated into the facility design to allow for operation of the Mobile LNG System at the Gig Harbor site as an emergency backup system to the plant supply.

Findings:
 The following items were not found in PSE's procedures.
 Item #174 – Warning signs, must be recognizable at night from 100 ft
 Item #175 – Signs must be marked with the words 'NO TRESSPASSING' or equivalent.

STANDARD INSPECTION REPORT OF AN LNG FACILITY

Name of Operator: Puget Sound Energy		
OP ID No. ⁽¹⁾ 22189	Unit ID No. ⁽¹⁾	
H.Q. Address: 355 110 Ave NE/EST-07W Bellevue, WA	System/Unit Name and Address ⁽¹⁾ Gig Harbor LNG Satellite 9410 54 th Ave NW Gig Harbor, WA 98335	
Co. Official: Cheryl McGrath Phone No.: (425)462-3207 Fax No.: (425)462-3770 Emergency Phone No.: (800)552-7171	Activity Record ID#: UTC Docket No. PG-110046 Phone No.: (253)476-6340 Fax No.: (425)462-3770 Emergency Phone No.: (800)552-7171	
Persons Interviewed	Titles	Phone No.
Darryl Hong	Compliance Specialist	(425)462-3911
Chuck Dougherty	Supervisor, Alternate Fuels	(253)476-6202
Sharron Morgan	Maintenance Coordinator, Alternate Fuels	(253)476-6014
Greg Lillehaug	Lead Operator	(206)391-8126
Don Bourdage	Operator	(253)261-3134
Dick Pelton	Operator	(253)405-9344
Derek Kane	Operator	(253)405-7279
PHMSA Representative(s) ⁽¹⁾ Lex Vinsel	Date(s) ⁽¹⁾ October 24-27, 2011	
LNG Plant Maps/Diagrams (copies for Region Files):		
Type of facility: Base Load <input type="checkbox"/> Satellite <input checked="" type="checkbox"/> Peak Shaving <input type="checkbox"/> Mobile/Temporary <input type="checkbox"/>		
<small>Note: Some mobile and temporary LNG facilities must meet the requirements of Section 2.3.4 of NFPA 59A (2001 edition) in lieu of the requirements of Part 193 per 193.2019.</small>		
Year Facility Was Placed In Operation:	2004	
Liquefaction Rate, MMCFD:	None	
Type Of Liquefaction Cycle:	None	
Number of Vaporizers & Capacities:	One - 65-650 SCFH	
Storage Tank Statistics - Fabricator, Volumes, Materials, etc:	Two - 70,000 gallon water capacity	

Comments:	
Primary System brought on line in 2004. 2 nd NEW tank was brought on line in 2006 System injects pressure into the IP line to support Regulators 4 and 5 for Gig Harbor.	

¹ Information not required if included on page 1.

For information relating to cooperation and coordination between PHMSA, FERC, and Coast Guard, reference the 1985 Memorandum of Understanding Between the Department of Transportation and the Federal Energy Regulatory Commission Regarding LNG Transportation Facilities, and the February 10, 2004 Interagency Agreement Among the Federal Energy Regulatory Commission United States Coast Guard and Research and Special Programs Administration for the Safety and Security Review of Waterfront Import/Export Liquefied Natural Gas Facilities.

NPMS INFORMATION and UPDATE		Yes	No
Did the operator submit their pipeline information to NPMS and did they submit any updates or changes? 49 U.S.C. 60132 and ADB-08-07 Sent E-mail - No Changes		X	

PROCEDURES							
		§193.2011 REPORTING PROCEDURES		S	U	N/A	N/C
2011	191.3 / 191.5	Immediate Notification of Certain Events					
			▪ Telephonically reporting incidents to NRC (800) 424-8802 or electronically at http://www.nrc.uscg.mil . EOP #5.7, GOS 2425.1100 #5.1.3	X			
			▪ Event that involves a release of gas or liquefied gas from an LNG facility and a death or personal injury necessitating in-patient hospitalization or property damage (includes cost of lost gas) of \$50,000 or more, unintentional estimated gas loss of three million cubic feet or more. EOP #5.7	X			
			▪ Event that results in an emergency shutdown. (Activation of an emergency shutdown system for reasons other than an actual emergency does not constitute an incident.). EOP #5.7	X			
		▪ Significant event (operator's judgment). No Incidents				X	
	191.7	Reports (except SRCRs) must be submitted electronically to PHMSA at https://opsweb.phmsa.dot.gov unless an alternative reporting method is authorized IAW with paragraph (d) of this section. None					X
	191.15	Incident Reporting (DOT Form PHMSA F 7100.3)					
			(b) Incident Report, as soon as practicable but NTE 30 days None During Time Frame				X
			(c) Supplemental Report, where additional related information is obtained. None During Time Frame				X
	191.17(b)	Annual Reporting (DOT Form PHMSA F 7100.3-1) Submitted annually not later than March 15 (June 15, for 2011) for preceding year. Yes/ Aug 15, 2011		X			
	191.22	Each operator must obtain an OPID, validate its OPIDs, and notify PHMSA of certain events at https://opsweb.phmsa.dot.gov Not yet required					X
		(c) Changes. Each operator of a gas pipeline, gas pipeline facility, LNG plant or LNG facility must notify PHMSA electronically through the National Registry of Pipeline and LNG Operators at https://opsweb.phmsa.dot.gov of certain events. (1) An operator must notify PHMSA of any of the following events not later than 60 days before the event occurs: (i) Construction or any planned rehabilitation, replacement, modification, upgrade, uprate, or update of a facility, other than a section of line pipe, that costs \$10 million or more. If 60 day notice is not feasible because of an emergency, an operator must notify PHMSA as soon as practicable; (iii) Construction of a new LNG plant or LNG facility. None During Time Frame					X
	191.25(a)	Filing safety-related condition reports.					
		▪ Within five (5) working days of determination. PSE OS 2425.1200(None)				X	
		▪ Within ten (10) working days of discovery. PSE OS 2425.1200(None)				X	

Comments:

EOP - Emergency Operation Procedure
PSE OS – Puget Sound Energy Operating Standard
LNG O&M -

		§193.2017	S	U	N/A	N/C
.2017	.2017(c)	Operator must have plans and procedures required for the plant. These plans and procedures must be reviewed and updated: (1) when a component is changed significantly or a new component is installed; and New Control System - PAC	X			
		(2) at intervals NTE 27 months, but at least once every 2 calendar years.	X			

Comments:

Programmable Automated Controller – Replaced old control system (RTU based) in July 2010.

		§193.2503 NORMAL OPERATING PROCEDURES	S	U	N/A	N/C
.2017	.2503	Written operating procedures that cover the topics in (a) through (g) must be provided.				
	.2503(a)	Monitoring operating components and buildings for leaks, fires, and malfunctions that could cause a hazardous condition (see §193.2507). PSE 0201-OP1 #24.6 & 24.8 Control Systems	X			
	.2503(b)	Startup and shutdown, including initial startup and performance testing to demonstrate that components will operate satisfactorily in service. 2503 #12.2	X			
	.2503(c)	Recognizing abnormal operating conditions. 14.12 & 15.8 Table(see Item 18)	X			
	.2503(d)	Purging and inerting - procedure must meet the provisions of AGA <i>Purging Principles and Practices</i> after being taken out of service and before being returned to service (see §193.2517). LNG O&M Sections 18, 14.8, and 15.5	X			
	.2503(e)	Maintaining the operation of vaporizers within design limits. (with regard to vaporization rate, temperatures, and pressures). LNG O&M Section # 24.8, 24.11 Table 12-1, Table 5-1, Section 5	X			
	.2503(f)	Maintaining the operation of liquefaction units within design limits. (with regard to temperatures, pressures, diff. pressures, and flow rates). None			X	
	.2503(g)	Cool down of components so thermal stresses are kept within design limits. After stabilization, cryo. piping systems must be checked for leaks. (see §193.2505). Section 13.3	X			

Comments:

Item 18 Section 14.12 Automatic Shutdowns & 15.8 Automatic Shutdowns

		§193.2509 EMERGENCY PROCEDURES	S	U	N/A	N/C
.2017	.2509(a)	The operator must determine the types and locations of non-fire emergencies that may reasonably be expected to occur due to operating malfunctions, structural collapse, personnel error, forces of nature, and activities adjacent to the plant. EOP #3.1, #2.6.8	X			

		§193.2509 EMERGENCY PROCEDURES	S	U	N/A	N/C
	.2509(b)	Written emergency procedures that cover topics (b)(1) through (b)(4) must be provided.				
	.2509(b)(1)	Responding to controllable emergencies including personnel notification and use of appropriate equipment. EOP #2.1, 2.2, 2.2.3, 4.2, 5.0, 5.1.2, 5.1.3	X			
	.2509(b)(2)	Recognizing and acting on uncontrollable emergencies. EOP #2.0, 4.0, 5.1.3	X			
	.2509(b)(3)	Coordinating evacuation plans with local authorities including catastrophic LNG tank failure. EOP #3.1.1.2, 5.2.4, 5.3, 5.3.2	X			
	.2509(b)(4)	Cooperating with local officials when mutual assistance is required, and keeping them informed of (i) - (iv).				
	.2509(b)(4)(i)	Types, quantities, and locations of fire control equipment. EOP #2.6.8	X			
	.2509(b)(4)(ii)	Potential hazards at the plant, including fires. EOP #3.0	X			
	.2509(b)(4)(iii)	Communication and emergency control capabilities at the plant. EOP #2.5	X			
	.2509(b)(4)(iv)	The status of each emergency. EOP Table 5A, III 1.0	X			

Comments:

		§193.2511 PERSONNEL SAFETY PROCEDURES	S	U	N/A	N/C
.2017	.2511(a)	Appropriate protective clothing and equipment must be provided for personnel who are performing emergency response duties.	X			
	.2511(b)	Personnel at fixed locations must either be protected from the heat of fires or have a means of escape.	X			
	.2511(c)	First aid materials must be available at a clearly marked location.	X			

Comments:

		§193.2513 TRANSFER PROCEDURES	S	U	N/A	N/C
.2017	.2513(a)	Written procedures for transferring LNG and other hazardous fluids must be provided.	X			
	.2513(b)	The procedures must include provisions for personnel to perform the tasks in (b)(1) through (b)(7).				
	.2513(b)(1)	Before transfer, verify that the transfer system is ready for use and that the system has been purged (if necessary).	X			
	.2513(b)(2)	Before transfer, verify that the receiving vessel does not contain an incompatible substance, and that it has enough available capacity to receive the amount of fluid to be transferred. Only LNG on site.	X			
	.2513(b)(3)	Before transfer, verify the maximum filling volume of the receiving vessel to ensure that expansion of the incoming fluid (due to warming) will not result in overfilling or overpressure.	X			
	.2513(b)(4)	When transferring LNG into a partially filled vessel, take whatever steps are necessary to prevent stratification. Top fill for 10 min. then bottom fill.	X			
	.2513(b)(5)	During transfer, keep an eye on transfer rates, liquid levels, and vapor returns in order to prevent overfilling or overpressuring.	X			

		§193.2513 TRANSFER PROCEDURES	S	U	N/A	N/C
	.2513(b)(6)	Manually terminate flow before overfilling or overpressuring occurs.	X			
	.2513(b)(7)	After transfer, deactivate the cargo transfer system in a safe manner (depressuring, venting, disconnecting, etc.).	X			
	.2513(c)	Written procedures for cargo transfer must be located at the transfer area, and they must include provisions for personnel to perform the tasks in (c)(1) through (c)(7).				
	.2513(c)(1)	Be in constant attendance during all cargo transfer operations.	X			
	.2513(c)(2)	Whenever a truck is being driven in reverse in the transfer area, ensure that someone is positioned at the back of the truck to aid the driver.	X			
	.2513(c)(3)	Before transfer, verify (c)(3)(i) through (c)(3)(iv).				
	.2513(c)(3)(ii)	All transfer hoses have been visually inspected for damage and defects.	X			
	.2513(c)(3)(iii)	Tank truck is electrically grounded and the wheels are chocked.	X			
	.2513(c)(3)(iv)	Tank truck engine is off, unless it is needed for the transfer.	X			
	.2513(c)(4)	If the truck engine is off during transfer, it is not to be restarted until the transfer lines are disconnected and any released vapors have dissipated. They take the key.	X			
	.2513(c)(5)	Prevent loading of LNG into a tank car or tank truck that is not in exclusive LNG service, unless specific tests have been performed.	X			
	.2513(c)(6)	Verify that all transfer lines have been disconnected and equipment cleared before allowing the tank car or tank truck to move from the transfer position.	X			
	.2513(c)(7)	Verify that transfers into a pipeline system will not exceed the pressure or temperature limits of the pipeline.	X			

Comments:

		§193.2515 INVESTIGATION OF FAILURE PROCEDURES	S	U	N/A	N/C
.2017	.2515	Each operator shall investigate the cause of each explosion, fire, or LNG spill or leak which results in:				
	.2515(a)	(1) death or an injury that requires hospitalization, or (2) property damage in excess of \$10,000. None	X			
	.2515(b)	After an investigation, appropriate action must be taken to minimize a recurrence. None	X			
	.2515(c)	Operator must cooperate during post-accident investigations and should maintain the scene in its post-accident state (to the extent practical). None	X			

Comments:

		§193.2519 COMMUNICATION SYSTEM PROCEDURES	S	U	N/A	N/C
.2017	.2519(a)	Primary communications system provides verbal communications for all employees and their assigned work stations. Intercom EOP 2.5	X			
	.2519(b)	Plants over 70,000 gallons storage capacity must provide an emergency communication system separate from the primary and security communication systems in 193.2909. Push To Talk on all Staff Phones	X			
	.2519(c)	Each communication system must have a backup power supply.	X			

Comments:

		§193.2521 OPERATING RECORD PROCEDURES	S	U	N/A	N/C
.2017	.2521	Each operator shall maintain a record of results of each inspection, test and investigation required by this subpart. For each LNG facility that is designed and constructed after March 31, 2000 the operator shall also maintain related inspection, testing, and investigation records that NFPA 59A requires. Such records, whether required by this part or NFPA 59A, must be kept for a period of not less than five years.	X			

Comments:

		§193.2605 MAINTENANCE PROCEDURES	S	U	N/A	N/C
.2017	.2605(a)	The operator must establish a schedule for conducting, consistent with generally accepted engineering practices, the periodic inspections or tests required by Subpart G, and must perform those inspections or tests.				
	.2605(c)	The maintenance manual(s) must include instructions on how to recognize safety-related conditions that would need to be reported (191.23).	X			

Comments:

		§193.2609 SUPPORT SYSTEM PROCEDURES	S	U	N/A	N/C
.2017	.2609	Foundations and support systems (e.g., pipe rack supports) must be inspected for changes that could impair their support.	X			

Comments:

		§193.2611 FIRE PROTECTION PROCEDURES	S	U	N/A	N/C
.2017	.2611(a)	The maintenance schedule for fire control equipment must minimize the amount of equipment that is out of service at any one time.	X			
	.2611(b)	Maintain access routes for movement of fire control equipment within the plant to reasonably provide for use in all weather conditions.	X			

Comments:

Comments:

		§193.2613 AUXILIARY POWER SOURCE PROCEDURES	S	U	N/A	N/C
.2017	.2613	Each auxiliary power source must be tested monthly to check its operational capability and tested annually for capacity. The capacity test must take into account the power needed to start up and simultaneously operate equipment that would have to be served by that power source in an emergency.	X			

Comments:

		§193.2615 ISOLATING AND PURGING PROCEDURES	S	U	N/A	N/C
.2017	.2615(a)	Before personnel begin maintenance activities on components handling flammable fluids which are isolated for maintenance, the component must be purged in accordance with a procedure which meets the requirements of AGA "Purging Principles and Practice," unless the maintenance procedures under §193.2605 provide that the activity can be safely performed without purging.	X			
	.2615(b)	If the component or maintenance activity provides an ignition source, a technique in addition to isolation valves (such as removing spool pieces or valves and blank flanging the piping, or double block and bleed valving) must be used to ensure that the work area is free of flammable fluids.	X			

Comments:

		§193.2617 REPAIR PROCEDURES	S	U	N/A	N/C
.2017	.2617(b)	The maintenance procedures must include precautions to be taken when repairing a component while it is operating.	X			

Comments:

		§193.2619 CONTROL SYSTEM PROCEDURES	S	U	N/A	N/C
.2017	.2619(a)	Each control system must be properly adjusted to operate within design limits.	X			
	.2619(b)	If a control system is out of service for 30 days or more, it must be inspected and tested for operational capability before returning it to service.	X			

		§193.2619 CONTROL SYSTEM PROCEDURES	S	U	N/A	N/C
	.2619(c)	Control systems in service, but not normally in operation, such as relief valves and automatic shutdown devices, and control systems for internal shutoff valves for bottom penetration tanks must be inspected and tested once each calendar year, not exceeding 15 months, with the following exceptions: (1) Control systems used seasonally, such as for liquefaction or vaporization, must be inspected and tested before use each season. (2) Control systems that are intended for fire protection must be inspected and tested at regular intervals not to exceed 6 months.	X			
	.2619(d)	Control systems that are normally in operation, such as required by a base load system, must be inspected and tested once each calendar year but with intervals not exceeding 15 months.	X			
	.2619(e)	Relief valves must be inspected and tested for verification of the valve seat lifting pressure and reseating.	X			

Comments:

		§193.2621 TESTING TRANSFER HOSE PROCEDURES	S	U	N/A	N/C
.2017	.2621(a)	Hoses used for transferring LNG or flammable refrigerant must be tested to the maximum pump pressure or the relief valve setting (whichever is less) once each calendar year, with intervals not to exceed 15 months.	X			
	.2621(b)	Hoses used for transferring LNG or flammable refrigerant must be inspected for damage or defect before each use.	X			

Comments:

		§193.2623 INSPECTING LNG STORAGE TANK PROCEDURES	S	U	N/A	N/C
	.2623	Storage tanks and their foundations must be inspected or tested to verify that the structural integrity or safety has not been impaired by conditions (a) through (d):				
.2017	.2623(a)	Foundation and tank movement during normal operation and after each major meteorological or geophysical disturbance.	X			
	.2623(b)	Inner tank leakage.	X			
	.2623(c)	Effectiveness of insulation.	X			
	.2623(d)	Frost heave	X			

Comments:

		§193.2625 CORROSION PROTECTION PROCEDURES	S	U	N/A	N/C
--	--	--	----------	----------	------------	------------

		§193.2625 CORROSION PROTECTION PROCEDURES	S	U	N/A	N/C
.2017	.2625(a)	Components that might have their integrity or reliability adversely affected by corrosion (internal, external, or atmospheric) must be identified.	X			
	.2625(b)	Components identified in §193.2625(a) must either be (1) protected from corrosion, or (2) inspected and replaced on a regular basis.	X			

Comments:

		§193.2627 ATMOSPHERIC CORROSION PROCEDURES	S	U	N/A	N/C
.2017	.2627	Components subject to atmospheric corrosion must either be:				
	.2627(a)	▪ made of a material that resists such corrosion, or	X			
	.2627(b)	▪ be protected by a suitable coating or jacketing.	X			

Comments:

		§193.2629 EXTERNAL CORROSION CONTROL PROCEDURES: BURIED OR SUBMERGED COMPONENTS	S	U	N/A	N/C
.2017	.2629(a)	Buried or submerged components that are subject to external corrosion must be:				
	.2629(a)(1)	▪ made of a material that resists such corrosion, or	X			
	.2629(a)(2)(i)	▪ protected by an external protective coating that meets 192.461, and	X			
	.2629(a)(2)(ii)	▪ protected by a cathodic protection system that meets 192.463 (within one year of construction or installation).	X			
	.2629(b)	Where cathodic protection is applied, electrically interconnected components must be protected as a unit.	X			

Comments:

		§193.2631 INTERNAL CORROSION CONTROL PROCEDURES	S	U	N/A	N/C
.2017	.2631	Components subject to internal corrosion must either be:				
	.2631(a)	▪ made of a material that resists such corrosion, or	X			
	.2631(b)	▪ protected by a suitable coating, inhibitor, or other means	X			

Comments:

Comments:

		§193.2633 INTERFERENCE CURRENT PROCEDURES	S	U	N/A	N/C
.2017	.2633(a)	Components subject to electrical current interference must be protected by a continuing program to minimize the detrimental effects of such currents.	X			
	.2633(b)	Each cathodic protection system must be designed and installed such that the detrimental effects it might have on adjacent metal components are minimized.	X			
	.2633(c)	Each impressed current power source must be installed and maintained in a manner that prevents adverse interference with communication and control systems.	X			

Comments:

		§193.2635 MONITORING CORROSION CONTROL PROCEDURES	S	U	N/A	N/C	
.2017	.2635(a)	Each buried or submerged component must be tested at least once each calendar year, with intervals not to exceed 15 months.	X				
	.2635(b)	Each cathodic protection rectifier or other impressed current power source must be inspected at least 6 times per year, with intervals not to exceed 2½ months.	X				
	.2635(c)	Each reverse current switch and diode must be checked at least 6 times per year, with intervals not to exceed 2 ½ months.	X				
			Each interference bond whose failure would jeopardize component protection must be checked at least 6 times per yr. with intervals not to exceed 2 ½ mo.	X			
			All other interference bonds must be checked at least once each calendar year, with intervals not to exceed 15 months.	X			
	.2635(d)	Each component that is protected from atmospheric corrosion must be inspected at intervals not exceeding 3 years.	X				
.2635(e)	If corrosion coupons or probes are used to monitor internal corrosion, they must be checked at least twice each calendar year, with intervals not to exceed 7 ½ months.	X					

Comments:

		§193.2637 REMEDIAL MEASURE PROCEDURES	S	U	N/A	N/C
.2017	.2637	Prompt remedial action must be taken whenever corrosion control deficiencies are found.	X			

Comments:

		§193.2707 OPERATIONS AND MAINTENANCE	S	U	N/A	N/C
.2017	.2707(a)	Operation or maintenance of components must be conducted only by personnel who have demonstrated their capability to perform their assigned functions by- (1) Successful completed training required by §§193.2713 and 193.2717; (2) Experience related to the assigned operation or maintenance function; and, (3) Acceptable performance on a proficiency test relevant to the assigned function.	X			
	.2707(b)	Personnel not meeting the requirements of paragraph .2707(a) may operate or maintain a component when accompanied and directed by an individual who meets the requirements.	X			
	.2707(c)	Corrosion control including the design, installation, operation, and maintenance of cathodic protection systems, must be carried out by, or under the direction of, a person qualified by experience and training in corrosion control technology.	X			

Comments:

		§193.2711 PERSONNEL HEALTH	S	U	N/A	N/C
.2017	.2711	Must have a written plan for evaluating the health and physical condition of personnel assigned operations, maintenance, security, or fire protection duties.	X			

Comments:

		§193.2713 TRAINING PROCEDURES: OPERATIONS AND MAINTENANCE	S	U	N/A	N/C
.2017	.2713(a)(1)	New permanent maintenance, operating, and supervisory personnel must receive initial training in the following subjects. The training must be based on a written plan.	X			
	.2713(a)(1)(i)	Characteristics and hazards of LNG and other flammable fluids handled at the plant.				
		▪ Low boiling point and storage temperature (-260° F).	X			
		▪ Flammable limits of natural gas (5% to 15% in air).	X			
		▪ LNG and its vapor are odorless.	X			
		▪ LNG boils even more rapidly when spilled onto water or sprayed with water.	X			
	.2713(a)(1)(ii)	Potential hazards involved in operations and maintenance.	X			
	.2713(a)(1)(iii)	How to carry out operations and maintenance procedures that relate to their assigned functions.	X			
	.2713(a)(2)	All new personnel must receive initial training in the following subjects:				
	.2713(a)(2)(i)	How to carry out the emergency procedures that relate to their assigned functions (see §193.2509).	X			
	.2713(a)(2)(ii)	How to administer first aid.	X			
	.2713(a)(3)	All operating personnel and appropriate supervisory personnel must receive initial training in the following subjects. The training must be based on a written plan.	X			
.2713(a)(3)(i)	Detailed instructions on facility operations, including:					
	▪ Controls	X				

		§193.2713 TRAINING PROCEDURES: OPERATIONS AND MAINTENANCE	S	U	N/A	N/C
		▪ Functions	X			
		▪ Operating Procedures	X			
	.2713(a)(3)(ii)	LNG transfer procedures (see §193.2513).	X			
	.2713(b)	At intervals not to exceed two years, all personnel must receive refresher training in the subjects in which they received initial training. Refresher training must be based on a written plan.	X			

Comments:

		§193.2715 TRAINING; SECURITY	S	U	N/A	N/C
	.2715(a)	Personnel responsible for security at an LNG plant must receive initial training in the following subjects. The training must be based on a written plan.	X			
	.2715(a)(1)	How to recognize breaches of security.	X			
	.2715(a)(2)	How to carry out security procedures that relate to their assigned duties (see §193.2903).	X			
.2017	.2715(a)(3)	Whatever plant operations and emergency procedures they need to know to effectively perform their assigned duties.	X			
	.2715(a)(4)	How to recognize conditions that call for security assistance.	X			
	.2715(b)	At intervals not to exceed two years, all personnel must receive refresher training in the subjects in which they received initial training. Refresher training must be based on a written plan.	X			

Comments:

		§193.2717 TRAINING; FIRE PROTECTION PROCEDURES	S	U	N/A	N/C
	.2717(a)	All operations and maintenance personnel, and their immediate supervisors, must be trained according to a written plan of initial instruction, including plant fire drills, to:				
	.2717(a)(1)	▪ Know the potential causes and areas of fires;	X			
	.2717(a)(2)	▪ Know the types, sizes, and predictable consequences of fire; and	X			
.2017	.2717(a)(3)	▪ Know and be able to perform their assigned fire control duties according to the procedures established under §193.2509 and by proper use of equipment provided under §193.2801.	X			
	.2717(b)	At intervals not to exceed two years, all operations and maintenance personnel, and their immediate supervisors, must receive refresher fire protection training. This training must include fire drills and must be based on a written plan.	X			
	.2717(c)	Plant fire drills must provide personnel hands-on experience in carrying out their duties under the fire emergency procedures required by §193.2509.	X			

Comments:

Comments:

		§193.2801 FIRE PROTECTION	S	U	N/A	N/C
		Note: For plants existing on March 31, 2000, operators had until September 12, 2005 to bring the LNG facility's ESD system, water delivery systems, detection systems, and personnel qualification and training into compliance with NFPA-59A.				
2017	NFPA-59A 9.1.2	The operator must conduct a fire protection evaluation.	X			
		(1) The type, quantity, and location of equipment necessary for the detection and control of fires, leaks, and spills of LNG, flammable refrigerants, or flammable gases.	X			
		(2) The type, quantity, and location of equipment necessary for the detection and control of potential electrical fires and fires not involving LNG processes.	X			
		(3) The methods necessary for protection of the equipment and structures from the effects of fire exposure.	X			
		(4) Fire protection water systems.	X			
		(5) Fire extinguishing and other fire control equipment.	X			
		(6) The equipment and processes to be incorporated within the ESD system, including analysis of subsystems, if any, and the need for depressurizing specific vessels or equipment.	X			
		(7) The type and location of sensors necessary to initiate automatic operation of the ESD system or its subsystems.	X			
		(8) The availability and duties of individual plant personnel and what response personnel from outside the plant are available during an emergency.	X			
	(9) The protective equipment, special training, and qualification needed by individual plant personnel for his or her respective emergency duties.	X				
	NFPA-59A 9.2.1	LNG Facility shall incorporate an ESD system(s) that when operated isolates or shuts off sources of LNG and all other flammable liquids or gases, and shuts down equipment that adds or sustains an emergency if continued to operate.	X			
	NFPA-59A 9.2.2	Equipment, that when shutdown, introduces an additional hazard or result in substantial mechanical damage to equipment, may be omitted from the ESD system as long as the effects of the continued release of flammable or combustible fluids are controlled. None			X	
	NFPA-59A 9.2.3	The ESD system(s) shall be of a failsafe design or shall be installed, located, or protected from becoming inoperative during an emergency or failure at the normal control system. ESD systems that are not of a failsafe design, all components that are located within 50 ft (15 m) of the equipment it controls shall be: (1) Installed or located where they cannot be exposed to a fire, or (2) Protected against failure due to a fire exposure for at least 10 minutes.	X			
NFPA-59A 9.2.4	Operating instructions identifying the location and operation of emergency controls must be posted conspicuously in the facility area.	X				
NFPA-59A 9.2.5	Initiation of the ESD system(s) shall be manual, automatic, or both manual and automatic. Manual actuators shall be located in an area accessible in an emergency, and at least 50 ft (15 m) from the equipment they serve, and shall be distinctly marked with their designated function.	X				
NFPA-59A 9.3.1	Areas, including enclosed buildings, that have a potential for flammable gas concentration, LNG, or flammable refrigerant spills and fire must be monitored for the presence of gas or spilled liquid.	X				
NFPA-59A 9.3.2	Flammable gas detectors must activate visual and audible alarms at the plant site and at an attended location if the facility is not constantly attended.	X				
NFPA-59A 9.3.2	The low-temperature sensors or flammable gas detection system shall sound an alarm at a constantly attended location. Flammable gas detection system must be set no higher than 25% of the LFL of the gas being monitored.	X				

		§193.2801 FIRE PROTECTION	S	U	N/A	N/C
		Note: For plants existing on March 31, 2000, operators had until September 12, 2005 to bring the LNG facility's ESD system, water delivery systems, detection systems, and personnel qualification and training into compliance with NFPA-59A.	S	U	N/A	N/C
	NFPA-59A 9.3.3	Fire detectors must sound an alarm at the plant site and at an attended location if the facility is not constantly attended. If so determined IAW 9.1.2 fire detectors shall activate portions of the ESD system.	X			
	NFPA-59A 9.3.4	Any changes to the detection systems as the result of the NFPA-59A 9.1.2 survey shall be designed, installed, and maintained IAW NFPA-72 or NFPA-1221.	X			
	NFPA-59A 9.4.1	A fire water supply and delivery system must be provided, unless the fire protection evaluation (9-1.2) indicates that fire water is unnecessary or impractical.	X			
	NFPA-59A 9.4.2	The fire water supply and distribution systems shall provide for the simultaneous supply of fixed fire protection systems, at their design flow and pressure, plus 1000 gpm (63 L/sec) for not less than 2 hours.	X			
	NFPA-59A 9.5.1	Portable or wheeled fire extinguishers, recommended for gas fires, available at strategic locations.	X			
	NFPA-59A 9.5.2	If automotive and trailer-mounted fire apparatus is provided at the plant it shall not be used for any other purpose. None			X	
	NFPA-59A 9.5.3	All automotive vehicles assigned to the plant shall have a minimum of one portable dry chemical extinguisher with a capacity of at least 18 lb (8.2 kg). None			X	
	NFPA-59A 9.7.1	Protective clothing shall be available and readily accessible at the facility to provide protection against exposure to LNG (including cryogenic gloves, safety glasses, face shields, and coveralls or long-sleeve shirts).	X			
	NFPA-59A 9.7.2	Each facility worker who might be endangered by exposure to fire or smoke while performing fire control duties must be supplied with appropriate protective clothing and equipment (including SCBA, if necessary). Note: Duties of employees assigned to this plant do not involve fighting catastrophic fire and therefore, this section does not really apply. Nevertheless, the protective equipment including fire suits are provided for the employees as stated in EOP 4.7.1.	X			
	NFPA-59A 9.7.3	Operator shall have written practices and procedures to protect employees from the hazards if required to enter a confined or hazardous space.	X			
	NFPA-59A 9.7.4	At least three portable flammable gas detectors must be readily available for use.	X			
	NFPA-59A 9.9.1	Procedures to manually depressurize portions of the plant, as necessary for safety. Isolate portions of the plant from storage tanks or other LNG sources by venting LNG to the atmosphere in case of an emergency. (The direction of discharge shall minimize exposure to personnel or equipment.)	X			
	NFPA-59A 9.9.2	Detailed procedures for taking an LNG container out of service. This action shall not be regarded as a normal operation and not attempted on a routine basis.	X			

Comments: 193.2801 section references 2001 edition of NFPA 59A

		§193.2903 SECURITY PROCEDURES	S	U	N/A	N/C
.2017	.2903	Written security procedures must be available at the plant. The procedures must discuss topics (a) through (g). LNG Plant O&M -- Appendix J Security Procedures	X			
	.2903(a)	Description and schedule of security inspections and patrols.	X			
	.2903(b)	A list of security personnel positions or responsibilities.	X			
	.2903(c)	Brief description of the security duties of security personnel.	X			
	.2903(d)	Description of actions to be taken when there is an indication of an actual or attempted breach of security.	X			

		§193.2903 SECURITY PROCEDURES	S	U	N/A	N/C
	.2903(e)	Method(s) for determining which persons are allowed access to the LNG plant.	X			
	.2903(f)	Positive identification of all persons who enter the plant or are in the plant area, using a method at least as effective as picture badges.	X			
	.2903(g)	Liaison with local law enforcement officials to keep them informed about current security procedures.	X			

Comments:

		§193.2907 PROTECTIVE ENCLOSURE CONSTRUCTION PROCEDURES	S	U	N/A	N/C
.2017	.2907(a)	Each protective enclosure must have a combination of strength and configuration that is sufficient to obstruct unauthorized access to the enclosed facilities.	X			
	.2907(b)	Openings in or under the enclosure must be secured by grates, doors, or covers that provide at least the same level of protection as the enclosure.	X			

Comments:

		§193.2909 SECURITY COMMUNICATIONS PROCEDURES	S	U	N/A	N/C
.2017	.2909(a)	There must be a means for prompt communications between personnel with supervisory security duties and law enforcement personnel.	X			
	.2909(b)	There must be a means for communications between all on-duty personnel who have security duties and all control rooms/control stations.	X			

Comments:

		§193.2911 SECURITY LIGHTING PROCEDURES	S	U	N/A	N/C
.2017	.2911	If security warning systems are not provided for security monitoring, security lighting must be provided for protective enclosures and the areas they enclose (minimum of 2.2 lux from sunset to sunrise).	X			

Comments:

		§193.2913 SECURITY MONITORING PROCEDURES	S	U	N/A	N/C
--	--	---	----------	----------	------------	------------

		§193.2913 SECURITY MONITORING PROCEDURES	S	U	N/A	N/C
.2017	.2913	<p>If 250,000 bbls or more of storage capacity:</p> <ul style="list-style-type: none"> each protective enclosure and the area around each facility listed in §193.2905(a) must be monitored for the presence of unauthorized persons. monitoring must be by visual observation in accordance with the schedule in the security procedures under §193.2903(a) or by security warning systems that continuously transmit data to an attended location. <p>If less than 250,000 bbls of storage capacity:</p> <ul style="list-style-type: none"> only the protective enclosures need to be monitored. 	X			

Comments:

		§193.2915 ALTERNATIVE POWER SOURCE PROCEDURES	S	U	N/A	N/C
.2017	.2915	An alternative source of power that meets §193.2445 must be provided for security lighting and for security monitoring and warning systems.	X			

Comments:

		§193.2917 WARNING SIGN PROCEDURES	S	U	N/A	N/C
.2017	.2917(a)	Warning signs, readable at night from a distance of 100 ft. must be placed conspicuously along each protective enclosure.		X		
	.2917(b)	The signs must be marked with the words "NO TRESPASSING", or words of comparable meaning, on a background of sharply contrasting color.		X		

Comments:
 Items 174 & 175 Do not appear to be in the procedures. The requirement for sign visibility at 100 ft at night and the words "NO TRESPASSING" or equivalent do not appear in facility procedures.

		PART 199 – DRUG and ALCOHOL TESTING REGULATIONS and PROCEDURES	S	U	N/A	N/C
Subparts A - C		Drug & Alcohol Testing & Alcohol Misuse Prevention Program – Use PHMSA Form # 13, PHMSA 2008 Drug and Alcohol Program Check Form #13 emailed to stanley.kastanas@dot.gov on Jan. 5, 2012.				

RECORDS

		§191.5 and §191.25 RECORDS (5-year minimum retention)	S	U	N/A	N/C
191.5	Incident reports (telephonic notification).	None	X			
191.25	Safety-related condition reports (corrective action?).	None	X			

§193.2521 OPERATING RECORDS (5-year minimum retention)		S	U	N/A	N/C
.2017(c)(2)	Review and update the plans and procedures at intervals not exceeding 27 months, but at least once every 2 calendar years.	X			
.2503(c)	Investigation of Abnormal Operating Conditions. None	X			
.2503(e)	Vaporization Records.	X			
.2503(f)	Liquefaction Records. None			X	
.2505(b)	Cooldown Records.	X			
.2507	Records associated with Monitoring Operations.	X			
.2509(b)(3&4)	Public Liaison with Fire, Police, emergency responders, and local officials.	X			
.2513	Records associated with transferring LNG or other hazardous fluids.	X			
.2515	Investigation of Failures.	X			

§193.2639(a) MAINTENANCE RECORDS (5-year minimum retention)		S	U	N/A	N/C
.2603(c & d)	Components taken out of service.	X			
.2609	Support systems (foundations and pipe rack supports).	X			
.2611(a)	Maintenance activities scheduled on fire control equipment so a minimum of equipment is out of service at one time. Equipment is returned to service in a reasonable period of time.	X			
.2613	Auxiliary power sources.				
	▪ Operational tests (starting, fuel supply, etc.) (monthly).	X			
	▪ Capacity tests (under load) (annually).	X			
.2617	Repairs.	X			
.2619(b)	Control systems out of service for 30 days or more must be inspected and tested for operational capability before returning to service. Never out of service.			X	
.2619(c)	Automatic shutdown devices (once per year; not to exceed 15 months).	X			
.2619(c)(1)	Seasonal control systems (liquefaction/vaporization) (prior to use).	X			
.2619(c)(2)	Fire protection control systems (not to exceed 6 months).	X			
.2619(d)	Control systems normally in use (once per year; not to exceed 15 months).	X			
.2619(e)	Relief valves (once per year; not to exceed 15 months).	X			
.2605(b)	Any applicable components not listed in the line items above (such as ESD system, gas and low temperature detectors, fire protection water systems, and fire extinguishers) inspections/tests per operator's maintenance manual.	X			

Comments:

§193.2639(a) MAINTENANCE RECORDS - CONTROL SYSTEMS - (5-year minimum retention)		S	U	N/A	N/C

	§193.2639(a) MAINTENANCE RECORDS - CONTROL SYSTEMS - (5-year minimum retention)	S	U	N/A	N/C
.2621	Transfer hose inspection records (once per year; not to exceed 15 months).	X			
.2623	LNG storage tank inspection records.				
	▪ Foundation and tank movement.	X			
	▪ Inner tank leakage.	X			
	▪ Effectiveness of insulation.	X			
	▪ Frost heave.	X			

	§193.2639(b) MAINTENANCE RECORDS - CORROSION CONTROL - (retain for life of facility)	S	U	N/A	N/C
.2635(a)	Cathodic protection records (once per year; not to exceed 15 months).	X			
.2635(b)	Rectifier inspection records (6 per year; not to exceed 2 ½ months). None			X	
.2635(c)	Critical interference bonds (6 per year; not to exceed 2 ½ months); noncritical interference bonds (15 months). None			X	
.2635(d)	Atmospheric corrosion records (once every 3 years).	X			
.2635(e)	Internal corrosion monitoring records (twice per year; not to exceed 7 ½ months). No corrosive material in system.			X	
.2639(c)	Records or maps showing CP components, and structures bonded to the pipeline. (Maintained for the life of the pipeline.)	X			

Comments:

	§193.2711 PERSONNEL HEALTH (Retain for duration of employment, or per requirements of operator's health plan.)	S	U	N/A	N/C
.2711	Personnel health records.	X			

Comments:

	§193.2713 / .2715 / .2717 INITIAL and FOLLOW-UP TRAINING (retain for duration of employment, plus one year)	S	U	N/A	N/C
.2713(a)	Initial training - operations and maintenance.				
	▪ Characteristics and hazards of LNG.	X			
	▪ Emergency procedures related to assigned duties.	X			
	▪ First-aid.	X			
	▪ Facility operations, controls, functions.	X			

§193.2713 / .2715 / .2717 INITIAL and FOLLOW-UP TRAINING (retain for duration of employment, plus one year)		S	U	N/A	N/C
	▪ LNG transfer operations.	X			
.2713(b)	Follow-up operations and maintenance training (every 2 years).	X			
.2715(a)	Initial training - security.				
	▪ Recognize breaches of security.	X			
	▪ Carry out security procedures related to assigned function.	X			
	▪ Recognize conditions where security assistance is needed.	X			
.2715(b)	Follow-up security training (every 2 years).	X			
.2717(a)	All plant maintenance and operations personnel including immediate supervisors, must be trained according to a written plan of initial instruction, including plant fire drills, to:				
	▪ Know the potential causes and areas of fire;	X			
	▪ Know the types, sizes, and predictable consequences of fire; and	X			
	▪ Know and be able to perform their assigned fire control duties and proper use of equipment.	X			
.2717(b)	Follow-up fire protection training, including plant fire drills, (every 2 years).	X			
.2717(c)	Plant fire drills must provide personnel hands-on experience in carrying out their duties under the fire emergency procedures.	X			

Comments:

FIELD REVIEW		S	U	N/A	N/C
.2441	Control Center	X			
.2511(c)	First aid material.	X			
.2519(a)	Verbal communication system for all operating personnel.	X			
.2519(b)	Verbal emergency communication system (if >70,000 gal).	X			
.2519(c)	Backup power supply for communication systems.	X			
.2607(a)	Excessive external icing.	X			
.2607(b)	LNG plant grounds maintenance and upkeep (grass, trash, ... etc.).	X			
.2609	Support systems (foundations, pipe rack supports, etc.).	X			
.2611(b)	Access routes for fire control equipment kept clear of snow, etc.	X			
.2613	Auxiliary power supply.	X			
.2619(a)	Control systems calibrated to operate within design limits.	X			
.2621(b)	Transfer hose(s).	X			
.2623	Storage tanks.	X			

	FIELD REVIEW	S	U	N/A	N/C
.2627	Atmospheric corrosion.	X			
.2635	Cathodic protection (CP levels).	X			
NFPA-59A 9.2.3	ESD System initiation devices and ESD Station locations.	X			
NFPA-59A 9.2.4	Operating instructions identifying the location and operation of emergency controls shall be posted conspicuously in the facility area.	X			
NFPA-59A 9.3.1	Monitor enclosed buildings that have a potential for flammable refrigerant spills and fire. None			X	
NFPA-59A 9.3.2	Continuously monitored low-temperature sensors to sound an alarm or flammable gas detection system (to activate at not more than 25% LFL.) to activate an audible and visual alarm.	X			
NFPA-59A 9.3.3/4	Fire detection system.	X			
NFPA-59A 9.4	Fire protection water system.	X			
NFPA-59A 9.5.1	Portable fire extinguishers Purple K	X			
NFPA-59A 9.5.3	Fire extinguisher (at least 18 lb. (8.2 kg) on each automotive vehicle assigned to the plant). No vehicle assigned to plant.			X	
NFPA-59A 9.7.1	Protective clothing, equipment (including cryogenic gloves, safety glasses, face shields, and coveralls or long-sleeve shirts).	X			
NFPA-59A 9.7.4	Portable gas detectors available (a least 3).	X			
.2905	Protective enclosures.	X			
.2911	Lighting.	X			
.2915	Alternative power sources.	X			
.2917	Warning signs along fence or boundary, visible at 100 ft. at night.	X			

Comments: