

NOTICE OF AMENDMENT

VIA ELECTRONIC MAIL TO: ross.turrini@nationalgrid.com

August 29, 2025

Ross Turrini
Chief Operating Officer, NY Gas Business
National Grid USA
25 Hub Drive
Melville, NY 11747

CPF 4-2025-041-NOA

Dear Mr. Turrini,

From August 13 through 15, 2024 of the on-site inspection, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) inspected Niagara Mohawk Power Corporation's¹ (Niagara) procedures for operations and maintenance for its liquefied natural gas (LNG) facility in Providence, Rhode Island.

As a result of the inspection, PHMSA has identified an apparent inadequacy found within Niagara's plans or procedures. The item inspected and the inadequacy is described below:

1. **§193.2509 Emergency procedures.**
 - (a)
 - (b) **To adequately handle each type of emergency identified under paragraph (a) of this section and each fire emergency, each operator must follow one or more manuals of written procedures. The procedures must provide for the following:**
 - (1)
 - (3) **Coordinating with appropriate local officials in preparation of an emergency evacuation plan, which sets forth the steps required to protect the public in the event of an emergency, including catastrophic failure of an LNG storage tank.**

¹ Niagara Mohawk Power Corporation is a subsidiary of National Grid USA.

Niagara's manual of written emergency procedures for its Providence, Rhode Island, LNG facility was inadequate to handle each type of emergency identified under paragraph (a) of § 193.2509 and each fire emergency in accordance with §193.2509(b)(3). Specifically, Niagara's *Facility Response Plan, FRP-4 SP 7.0* failed to contain instructions on coordinating with the appropriate local officials to prepare its emergency evacuation plan.

Niagara's response plan did not include information or steps required to protect the public, such as: which local authorities to contact in the event of an incident; requirements to host or participate in emergency drills designed to prepare Niagara's personnel and local authorities to respond to facility emergencies and foster cooperative relationships; guidance on how to coordinate with local authorities during emergencies that require evacuation of the facility and community; or requirements for records of drills or discussions with local authorities to be retained.

Therefore, PHMSA proposes that Niagara must update its manual of written emergency procedures to include requirements to coordinate with local officials in preparation of an emergency evaluation plan, which sets forth the steps required to protect the public in the event of an emergency, including catastrophic failure of an LNG tank, in accordance with §193.2509(b)(3).

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 CFR § 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 CFR § 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 Niagara maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Bryan Lethcoe, Director, Southwest Region, Office of Pipeline Safety, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 4-2025-041-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Bryan Lethcoe
Director, Southwest Region, Office Pipeline Safety
Pipeline and Hazardous Materials Safety Administration

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

cc: Corinne Byrnes, Principal Program Manager – Federal Programs,
corinne.byrnes@nationalgrid.com