(1) 49 CFR §193.2019(e) Control Systems. A-2012-2294474

A tracking spreadsheet has been developed to more effectively verify that all relief valves have been inspected and tested on an annual basis. A sample of this spreadsheet has been included in this submittal, reference Appendix A. By presenting consecutive years on a single sheet the inspection summary form is better constructed at assuring that each relief valve receives an annual inspection. Effective 2015, this new format will be implemented for all the facility's relief valve inspections.

(2) 49 CFR §193.2625(a) Corrosion Protection.

To better prepare the facility on identifying points for atmospheric corrosion inspection the following corrosion mitigation project has been developed. This two phase project is expected to take 3-5 years to complete but will provide a resource for future inspections and offers a solution to mitigating future corrosion concerns to visual inspection of coating systems and non-conductive interfaces.

Phase I: Corrosion Audit

An audit will be conducted at the facility to identify points of corrosion, with more detail, that require annual inspection. Areas of highest concern are: 1.) the facility's original pipe support racks where there is no insulating pad between the bottom of the pipe and the supporting steel and 2.) where carbon steel piping has been insulated. To better facilitate this process, a worksheet has been developed to track the audit, see Appendix B. The majority of the information pertaining to each interface can be gathered from visual walkthrough of the facility and by developing a support identification system for the pipe racks. This initial phase of the project is expected to be completed in one year and will serve as a tracking resource for ongoing inspections.

Phase II: Corrosion Inspection/Mitigation

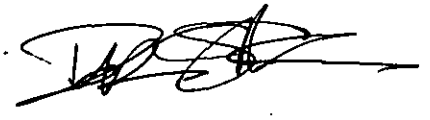
Once each point is clearly defined, the severity of any existing corrosion will need to be evaluated. This evaluation will be based on the procedure outlined in ASME B31G, Manual for Determining the Remaining Strength of Corroded Pipelines. This supplemental guide is considered acceptable since all piping within the facility is constructed of seamless, API 5L or ASTM A106 line piping.

Based on this review, the segment of pipe inspected may receive one of the two following measures:

1.) Pipe Replacement – If the corroded region analyzed exceeds the maximum allowable extent, as defined in Eq. 2 of ASME B31G then this segment will need be replaced with a new segment of pipe. The replaced segment of pipe will receive the facility's required coating system and a non-conductive interface between the pipe and support.

2.) Coating Replacement – If the corroded region analyzed does not exceed the maximum allowable extent then this segment will be properly prepared to receive a new coating system and a non-conductive interface between the pipe and support.

The use of a non-conductive interface between the pipe and support system will allow for future inspections to be confined to the integrity of the pipe coating system and the adhesion between pipe and insulating shoe. This final phase is expected to take up to five years to complete due to effort required to access the pipe to support interfaces.



Derek C. Schoiack
LNG Plant Manager
UGI Energy Services

Appendix A: Relief Valve Inspection Worksheet

RELIEF VALVE INSPECTION AND TESTING
LNG Tank and Equip

Tag ID	PSV-1	PSV-2	PSV-32	PSV-10	PSV-4	PSV-29	PSV-22	PSV-23	PSV-23A	PSV-27	PSV-27A	PSV-301	PSV-302	PSV-304
Size	6" x 8"	6" x 8"	1/2" x 3/4"	1/2" x 3/4"	1/2" x 3/4"	1/2" x 3/4"	1 1/2" x 2"	3/4" x 1"	3/4" x 1"	1/2" x 1"	1/2" x 1"	1" x 1 1/4"	1" x 1 1/4"	1" x 1 1/4"
Manufacturer / Model			Anderson Greenwood & Co. 81B46 2	Anderson Greenwood & Co. 81B46 2	Anderson Greenwood & Co. 81B45 2	Anderson Greenwood & Co. 81B46 2	C. Lonergan Co. 23K703	Dresser 1543E	Dresser 1543E			Flow Safe FBS-5	Flow Safe FBS-5	Flow Safe FBS-5
Setpoint	54 PSIG	54 PSIG	35 PSIG	35 PSIG	35 PSIG	20 PSIG	95 PSIG	90 PSIG	90 PSIG	450 PSIG	450 PSIG	100 PSIG	200 PSIG	400 PSIG
Location	Top of LNG tank	Top of LNG tank	LNG tank EQV-30	LNG tank EQV-30	LNG tank EQV-2	Flush Gas line/HCV 50-3 to BOC 1	1st stage suction to BOC #1 & BOC #2	Interstage of BOC #1	Interstage of BOC #2	BOC #1 2nd stage discharge	BOC #2 2nd stage discharge	Recirc line of BOC #3	BOC #3 1st stage discharge	BOC #3 2nd stage discharge
Date Tested	7/29/2010	7/29/2010	8/4/2010	8/4/2010	7/1/2010	7/12/2010	10/1/2010	10/1/2010	10/1/2010	10/1/2010	10/1/2010	10/1/2010	10/1/2010	10/1/2010
Initials	MG	MG	MG	MG	MG	MG	MG	MG	MG	MG	MG	MG	MG	MG
Comments	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF
Date Tested	7/29/2011	7/29/2011	7/21/2011	7/21/2011	7/21/2011	7/21/2011	7/21/2011	7/21/2011	7/21/2011	7/21/2011	7/21/2011	7/21/2011	7/21/2011	7/21/2011
Initials	MG / AD	MG / AD	MG / AD	MG / AD	MG / AD	MG / AD	MG / AD	MG / AD	MG / AD	MG / AD	MG / AD	MG	MG	MG
Comments	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF
Date Tested	7/19/2012	7/19/2012	7/19/2012	7/19/2012	7/19/2012	7/19/2012	7/19/2012	7/19/2012	7/19/2012	7/19/2012	7/19/2012	7/19/2012	7/19/2012	7/19/2012
Initials	MG	MG	MG	MG	MG	MG / AD	MG / AD	MG / AD	MG / AD	MG / AD	MG / AD	MG / AD	MG / AD	MG / AD
Comment	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF
Date Tested	7/16/2013	7/16/2013	7/9/2013	7/9/2013	7/12/2013	7/12/2013	7/11/2013	7/11/2013	7/11/2013	7/11/2013	7/11/2013	7/11/2013	7/11/2013	7/12/2013
Initials	AD	AD	MG	MG	MG	MG	MG	MG	MG	MG	MG	MG	MG	MG
Comments	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF
Date Tested	8/6/2014	8/6/2014	8/6/2014	8/6/2014	8/6/2014	8/6/2014	8/5/2014	8/5/2014	8/5/2014	8/5/2014	8/6/2014	8/5/2014	8/5/2014	8/6/2014
Initials	BG	BG	MG	MG	MG	MG	MG	MG	MG	BG	BG	MG	MG	MG
Comments	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF	ASF
Date Tested														
Initials														
Comments														
Date Tested														
Initials														
Comments														

INITIALS LEGEND:
MG - MATT GENTILE
BG - BRANDON GEHRET
AD - ALDREW DUNNE
FI - FATHER FIDELIS
FH - FRANK HERNANDEZ

COMMENT LEGEND:
ASF - UNIT PLACED BACK IN SERVICE, AS FOUND
ASA - UNIT SETPOINT ADJUSTED (IF TEST EXCEEDS +/-5% OF SETPOINT)
REP - TESTED UNIT REPLACED OR REPAIRED (IF REPLACED, IDENTIFY NEW SERIAL NO.)
OTH - OTHER COMMENT

Note: For purpose of demonstrating the proposed layout, entries have been backfilled digitally. Future entries will be handwritten by the technicians.

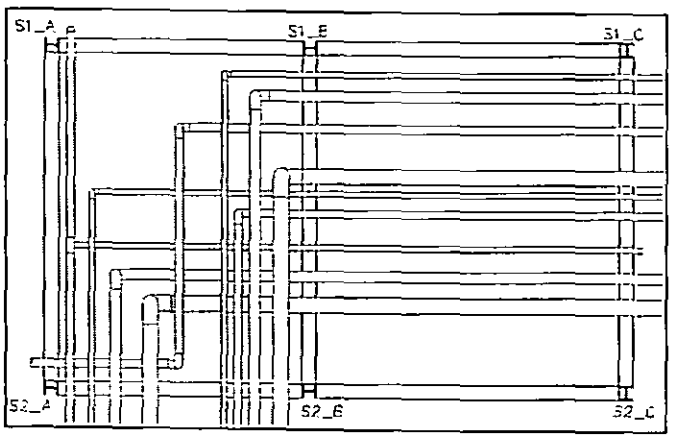
IREF: 01683

Appendix B: *Corrosion Audit Worksheet*

Atmospheric Corrosion Audit

Interface No.	Pipe Rack ID	Pipe Specification	Design Pressure (psig)	Nominal Pipe Diameter (in)	Pipe Schedule	Wall Thickness (in)	Type of Protection	Field Measurements[1]		Calculated[2]
								Min. Wall Thickness (in)	Corrosion Length (in)	Allow. Longitudinal Extent (in)
S1_A-4-40-200	S1_A	4" NG-E3-AC	200	4	40	0.237	Coating			
S1_B-4-40-400	S1_B	4" NG-20-SC	400	4	40	0.237	FRP			
S1_C-4-40-400	S1_C	4" NG-20-SC	400	4	40	0.237	Coating			
S1_B-3-40-200	S1_B	3" NG-35-AC	200	3	40	0.216	Coating			
S1_C-3-40-200	S1_C	3" NG-35-AC	200	3	40	0.216	Coating			
S1_B-4-40-200	S1_B	4" NG-E3-AC	200	4	40	0.237	Coating			
S1_C-4-40-200	S1_C	4" NG-E3-AC	200	4	40	0.237	Coating			

Support Identification Example:



Footnotes:

1. Measurements to be made with an ultrasonic pipe wall thickness gauge.
2. Calculated based on ASME B31G-2012; Manual for Determining the Remaining Strength of Corroded Pipelines

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