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Incident Review
4/16/2019, South Main St., Palmer - Excursion

Nature of incident and Type of work: Excursion of S Main St @ Stone Regulator Station

Location of Incident: S. Main St., Palmer - Station 0011464

Date of Incident: 4/16/2019

Time of Incident: 12:48

Number of Customers Involved: 0

Scope of Review:

Analyze the incident, determine root cause, and put in place measures to prevent reoccurrence.

Name of Manager: System Operations - Dana Argo, Operations Center Manger- Dave Nelson

Name of Facilitator: Compliance Manager- Kathy Silver

Field Personnel including leadership involved in the incident:

Dana Argo - System Operations Manager

Jeff Croke - Measurement and Regulation (M&R) Leader

Jim Clement - Maintenance Mechanic M&R

Mike Brunelle - Maintenance Mechanic M&R

Peter Decoteau - Front Line Leader Leakage

Dave Nelson - Operations Center Manager

William Wert - Field Operations Leader

Veena Kothapalli - Leader Field Engineering

Randy Humberston - Gas Controller

Judreta Smith - Assigner

Cheryl Breece - IC Team Leader

Jeff Tiffner - IC Manager

Martin Poulin - Director Regulatory Policy

Kathy Silver - Compliance Manager

Corey Underwood - Leakage Technician

Phil Watson - Leakage Technician

Evan Lowe - Leakage Technician

T.J. Spencer - Leakage Technician

Todd Silvia - Technical Support Specialist

Anthony Eichstaedt - Locate/Leakage Technician

Jim Soares - Locate/Leakage Technician

Anthony Rogers - Service Technician A

Dave Harris - Maintenance Mechanic M&R

Steve Sottile - M&R Specialist 1

Charles Docherty - Maintenance Mechanic M&R

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Name of Employees Attending Review:

Adam J. Roorda - Manager Gas Control, Aimee Henderson - Manager Communication, Dana Argo - System Operations Manager, Dave Mueller - Manager Engineering, David Nelson - Operations Center Manager, Frank Davis - VP Safety Management, James D Clement - Maintenance Mechanic M&R, Jamie Staiti - Compliance Specialist, Jeff Tiffner - Manager IC, Jeffery B. Croke - Leader M&R, Maggie Cousineau - Manager System Operations, Mark Kempic - Chief Operating Officer, Martin Poulin - Director Regulatory, Matthew J. Mongeon - Lead Distribution Operator, Michael Crochier – Sr. Leader Field Operations, Michael J Brunelle - Maintenance Mechanic M&R, Peter Decoteau - Front Line Leader Leakage, Shaela Collins- Sr. Counsel, Sheila Doiron - Director Communications, Stella Deiana - Sr HR Consultant, Veena Kothapalli - Leader Field Engineering, William Wert - Leader Field Operations, Khristina Armstrong - Standard and Compliance Admin., Kim Cuccia - VP and General Counsel, Mark Dwight - Lead Auto Mechanic, Cheryl Breece - Team Leader IC

Did this incident merit review according to 49 CFR 192, Subpart L? Yes

Did this incident merit review according to circumstance or performance related issues?

Yes

Was Preliminary Report, Telephonic Notification Completed? Yes – State Reportable

Description of the system/asset impacted:

- 50,063 feet of high density plastic main.
- 186 feet of coated steel main.
- Approximately 163 services/271 customers.
- MOP = 60 psig.
- Regulators at station are two Flex Flo 2” 900TE.

Description of Incident – What actually happened from field prospective

- The Maintenance Mechanic M&R technician stopped to shut off a catalytic heater at S. Main Street Palmer station at approximately 12:20. He conducted a leak test around the door, and around the pit; climbed into the pit; and tried to shut off catalytic heater. He shut off a green knob to one heater and noticed no shut off to other heater. He traced the line to a shut off valve and turned it off, accidentally shutting off gas to the control regulator pilot. The valve that was shut off was tagged with “DO NOT OPERATE”. He left the pit and closed the doors. The technician received a call approximately 2-3 minutes later from his Leader that there was a spike in pressure at the pit. He turned around and went back to the site. The technician opened the pit door and re-entered. The technician turned the valve back on to the pilot. He put a gauge in to check pressure and found the pressure was at 65 psig. He requested a hose from his trainee. The technician verified paperwork and released pressure to 60 psig. The technician received a call from his Leader advising him not to make any further adjustments. The technician had lowered pressure to 54 and waited for his Manager to arrive.
 - At the conclusion of the after action review, the investigation identified the Pre Job Safety Briefing form, and the Vault and Pit Entry Checklist that were completed by Jim Clements. In discussions with Jim, he confirmed that he filled out both forms by himself and that the trainee was not observing the work at the regulator pit during the incident.

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- The Leader of M&R received a call from Gas Control at 12:49 with regard to pressure at Palmer Station. Palmer HHIH reading was at 68 psig; Monson HHIH reading was 56 psig. The M&R Leader starting calling in other M&R technicians.
 - 12:50 called Maintenance Mechanic M&R technician (Doherty) to head to Palmer.
 - 12:51 called Maintenance Mechanic M&R technician (Clement) to return to Palmer.
 - 12:57 called Gas Control, informed them the technicians on their way and thought technician may have shut off incorrect valve.
 - 13:03 notified System Operations Manager.
 - 13:20 pressure back to normal.
 - 13:24 called M&R Specialist to site to confirm pressure readings.
 - 16:00 Maintenance Mechanic M&R technicians sent for drug test.

- Gas Control received an alarm at 12:48 at S. Main St. Palmer. Pressure reading was at 68.15 psig. Gas Controller called M&R Leader at 12:49. At 12:50, Gas Control received Hi pressure alarm at Monson Line and a HHIH pressure alarm at 12:51. At 12:57, M&R Leader called into Gas Control to inform them that the M&R technician (Clement) was at the station prior to the alarms. At 13:06, HHIH pressure alarms cleared at both stations. At 13:08, Hi pressure alarms cleared at both stations - See Figure 1. Figure 2 depicts the Activity Report maintained by the Gas Control group for the incident.

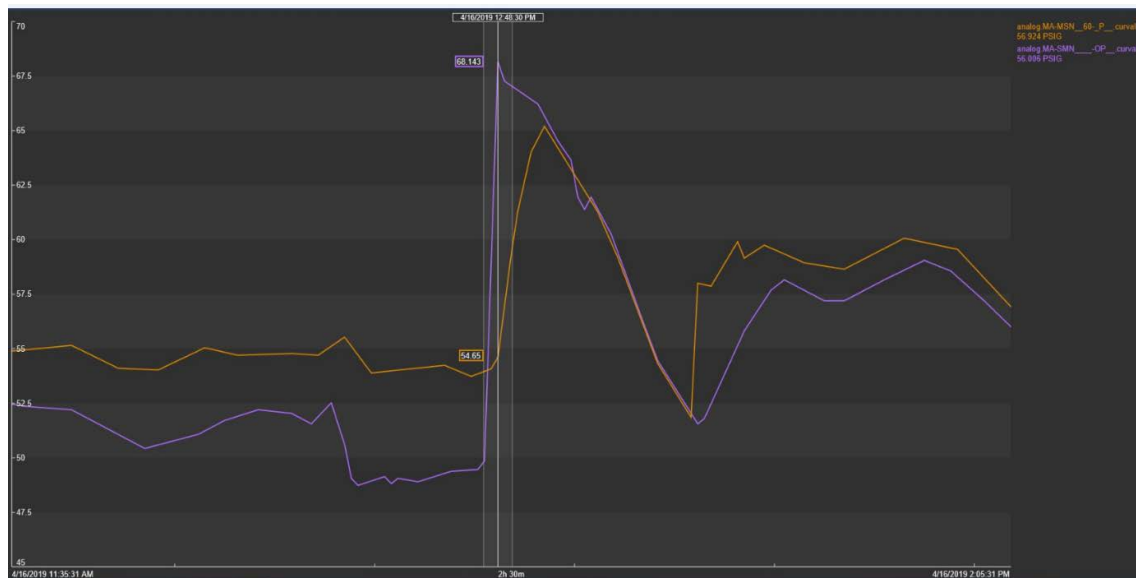


Figure 1: SCADA TREND 4.16.19 Palmer and Monson Stations

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Activity Number:
 A190416-1423-53



Activity Report

AOR: NORTH

Search for Location

Site: MN-MONSON GATE

Market: MONSON

Select Location

SCADA AOR:NORTH

ACTIVITY STATUS: CLOSED on 04/17/2019 10:21:44 AM

OCCURRENCE:	Date	Time	
	04/16/2019	12:48:29 PM	04/16/2019 12:48:29 PM EDT
NOTIFICATION:	04/17/2019	09:07:00 PM	04/17/2019 09:07:00 PM EDT
RESOLUTION:	04/17/2019	09:07:00 PM	04/17/2019 09:07:00 PM EDT

ACTIVITY DEFINITION

Date Logged: 04/16/2019 02:23:53 PM Logged By: Randy Humberston

Severity: SEV 1 SEV 2 SEV 3 SEV 4 SEV 5

Activity Type: ENOC Scada Support Point-to-Point
 HelpDesk Field

ENOC/HelpDesk Ticket Number:

Notification: IC Group and GC Management

Notify Comments:

RTU Name: MA-MNSN-BSG_

PTP & RTU IDs: PTP-6707

To READ a PTP or RTU Change request listed below: click on the Read PTP/RTU button.
 To UPDATE an OPEN PTP or RTU Change request: click on EDIT button at top of this form, then click on the EDIT PTP/RTU button.
 To CREATE a PTP or RTU Change request, click on EDIT button at top of this form, then click on the Create New POINT-to_POINT Request button.

Read PTP / RTU

Total # of PTP's & RTU's: 1

While reading this Activity, below you will only see the list PTP's & RTU's that were updated by this Activity.

ID	RTU Name	Site	Market	Created On	Related Activity	Status	Assigned To
PTP-6707	MN-MONSON GATE	MONSON	MA-MNSN-BSG_	04/17/2019	A190416-1423-53	Completed	(Closed)

ACTIVITY

04/16/2019 12:48:29 PM RANDY HUMBERSTON ~ Rec'd High High on the OP at 68.152#. I contacted Jeff Croke @ 1249. He will get someone headed that way. Also rec'd a High at 1250pm and High High at 1251pm on the 60# system from the Monson Gate station.

04/16/2019 01:06:29 PM RANDY HUMBERSTON ~ Both the 60# line came down to 59.18# and South Main and Palmer OP came down to high at 59.53#. Jeff Croke & Chuck Docherty both called to notify chuck was at the station prior.

04/16/2019 01:08:28 PM RANDY HUMBERSTON ~ The 60# line is now back to normal at 57.46# and the South Main OP is at normal at 57.76#

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04/16/2019 01:19:44 PM RANDY HUMBERSTON ~ The 60# system line is going in and out of High

04/16/2019 01:30:41 PM RANDY HUMBERSTON ~ South Main and Palmer OP now into High at 58#. This system also continues to chatter in and out of High

04/16/2019 01:49:43 PM RANDY HUMBERSTON ~ Monson 60# line back into High High at 60.06#

04/16/2019 01:50:29 PM RANDY HUMBERSTON ~ 60# line back to High just under 60#

04/16/2019 01:59:29 PM RANDY HUMBERSTON ~ South Main and Palmer back to normal at 57.92#

04/16/2019 02:02:28 PM RANDY HUMBERSTON ~ 60# Line back to normal at 57.73#

04/16/2019 02:40:38 PM RANDY HUMBERSTON ~ M&R Chuck Docherty 413.221.6464 is on site. Will be checking things out.

04/16/2019 03:35:56 PM RANDY HUMBERSTON ~ I spoke to Jeff Croke. Jim Clement had stopped at South Main and Palmer station to turn the heater off for the summer and shut the control line valve instead. Jeff said Jim was still close by and responded back. He says the monitor should have caught the pressure at about 59# so they are investigating what happened there.

04/16/2019 07:02:44 PM MICHAEL W MYERS ~ Called IC/ Cindy to verify they were notified about this issue. She said they were notified and had techs onsite.

04/16/2019 09:04:42 PM MICHAEL W MYERS ~ M&R Chuck Docherty (413.221.6464) called, said corrosion crew was enroute to do a survey. He asked about if we wanted a P2P, advised yes. He said he'll call back & do it.

RESOLUTION

04/16/2019 09:07:00 PM KEVIN MAYES ~ Chuck Docherty (413-221-6464) called in, they are done at the station and are packing up to leave. I completed a best practices P2P with Chuck.

	Field	SCADA
IP	616.9	618.29
OP	474.2	477.31
Line 60 Pressure	53.1	53.65

04/17/2019 10:21:24 AM DANIEL HECKENDORN ~ P2P entered.

Resolved Date/Time: 04/17/2019 10:21:44 AM **Closed by:** Daniel Heckendorn

Figure 2 – SCADA Activity Report 4.16.19 Palmer and Monson Stations

- System Operations Manager received a call at 13:03 advising of overpressure at S. Main St. Palmer Station. Advised M&R Leader to make safe, and not to work or touch anything in pit prior to investigation. Arrived onsite around 15:00. Spoke with M&R Leader, and the two Maintenance Mechanics M&R to review what had happened. The Manager then directed the technicians to confirm operating pressure, and to test monitor regulator for lock up. The initial indication was that the regulator was not bubble tight. After verification, the regulator was bubble tight, but the outlet valve has minimal leak by. The regulator was rebuilt, pilot was upgraded, old equipment removed and tagged for further investigation. Then a lock up test was performed on control regulator, which performed correctly. This regulator was also rebuilt, but did not replace the pilot as it has previously been upgraded. Manager notified Engineering to give them an update of incident. Manager called Leakage Leader – requesting system survey at 13:57.

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- Leakage Leader received a call at 13:57 requesting system survey of the overpressure area in Palmer and Monson. Leader contacted his Manager at 14:07. At 14:15, the leader received the maps and customer listing. At 15:06, he called the Compliance Manager with regard to the survey area. At 16:30, Leakage Leader arrived on site; leakage technician and contractor were already on site. At 17:00, the leakage survey of main commenced. At 17:30, the service line survey began. At 03:10, on April 17th, the survey was completed with two Can't Get In (CGI), due to a locked gate, which were completed that morning.
- At 14:18, the Operations Center Manager (OCM) spoke with the System Operations Manager. The OCM reviewed the Emergency Manual with his team of Field Operations Leaders. The OCM received a call from the Leakage Leader asking for locators on scene. At 14:35, the locators headed out to the area. The OCM secured all first shift service technicians for continuous daily work and had two street crews on standby staged in Wilbraham if needed. The OCM also sent a Field Operations Leader onsite to assist. At 18:30, the two service technicians were released. At 19:30, the remaining service technicians were released along with the street crews.
- Communications was notified at 14:01 by the System Operations Manager. Communications notified the Monson Fire Department at 16:06 of the situation and that leak surveys would be conducted in the area. At 16:18, an email with the street listing was sent to Monson Fire. The Monson Fire Department sent out a reverse 911 to local residents at 16:35. The Palmer police were notified at 16:23 after attempts to notify the Palmer Fire Department. A street listing was sent to Palmer police at 16:42.
- At 13:41, Columbus Integration Center (IC) Assigner was notified by the System Operations Manager and advised of a possible excursion on S. Main Street in Palmer Massachusetts, with Maintenance Mechanic M&R on site and the Leader M&R and System Operations Manager en route. At 13:55, Manager of IC contacted System Operations Manager to confirm details. IC Manger and Team lead contacted Director of Regulatory Policy to discuss details and agreed that a State DPU notification should be made. Assigner made notification to DPU at 14:28. At 15:05, the Springfield OCM contacted the IC to arrange for front line worker response and integration center support. At 15:47, a Pre-Emergency Notification System (ENS) was sent out. At 15:56, the initial ENS was submitted.

Timeline of Events

April 16, 2019

12:20 – Maintenance Mechanic M&R technician arrive at S Main Street Palmer Station to turn off catalytic heaters

12:46 – SCADA readings 49.7 psig

12:47 – SCADA readings 54.6 psig

12:48 –Gas Control received Hi-Hi Alarm 68.15 psig.

12:49 - Gas Control contacted M&R Leader.

12:50 –M&R Leader contacted Maintenance Mechanic M&R Tech to return to Palmer.

12:51 –M&R Leader contacted additional Maintenance Mechanic M&R Tech to head to Palmer.

12:54 – SCADA readings at 65.8 psig

12:57- M&R Leader contacted Gas Control to inform Techs on their way.

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13:03 –System Ops Manager notified.
13:06 –Pressure dropped below 60 psig.
13:16- System Operations Manager Notified Compliance Manager.
13:22 - Compliance Manager notified Director Regulatory Policy.
13:41- System Operations Manager notified Integration Center Assigner.
13:46 –Operations Center Manager notified.
13:55 - IC Manager contacted System Operations Manager.
13:57 –System Operations Manager called Leakage Leader requesting System Survey.
14:01 –Communications notified by Systems Ops Manager.
14:15 –Leakage received maps and customer list.
14:18 –OCM spoke with Systems Ops Manager.
14:28 - IC notified DPU.
14:35 –Locators sent out.
15:05 - M&R Leader onsite.
15:06 –Leakage Leader notified Compliance Manager.
15:47 - PRE-ENS submitted.
15:56- ENS submitted.
16:00 –FOL onsite.
16:18 –Communications contacted Monson Fire Chief via email.
16:30 –Leakage Leader and Leakage Contractors onsite.
16:35 –Reverse 911 sent out from Town of Monson.
16:42 –Street list sent to Palmer via Fax.
16:45 –Police and Fire Department advised of the situation (extra gas personnel in area).
17:00 –Started leakage survey of main.
17:30 –Started leakage survey of services
18:30 –First Service techs released.
19:15 –Remaining Service Techs released.
19:30 –Plant Crews released.
20:00 –Approx arrival of DPU onsite.

April 17, 2019

03:10 –Survey completed.

03:00 –FOL released.

*** - OCM & Michael Kane met with Town officials the next day.

Post Incident Steps and Results:

- Mobile Survey was complete on 4/16/2019.
- 163 services surveyed, complete on 4/17/2019. Fifteen non-hazardous meter fit leaks were found and entered into NIFAST for future repair.
- Monitor Regulator rebuilt and pilot upgraded on 4/16/2019.
- Control Regulator rebuilt. Was completed on 4/16/2019.
- Reset pressures – monitor – 55 psig, control – 53 psig on 4/16/2019.
- Engineering – reviewing station design and capacity.
- OCM and Director of Government Affairs met with Towns of Monson and Palmer on 4/17/2019.
- Springfield Operations reviewed service line records for the impacted distribution system. Completed on 4/23/2019
- Gathering and reviewing information if available from instruments commercial meters to get pressure readings? Can we download information?

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What was done well?

- Response time to the high high alarm by system operations. Team worked very well.
- Leakage techs arrived quickly and surveys done with efficiency considering conditions different from normal everyday surveys.
- M&R technicians worked very well under pressure/stress.
- Great communications from upper management to all of CMA.

Conclusion: The technician shut off a valve clearly identified, “DO NOT OPERATE”. See Figure 3 for picture of new Tag installed on 4/16/2019 by Maintenance Mechanic M&R Technician, because the old tag was dirty but still legible. While there is no known standard operating procedure governing “Do Not Operate” tags, such failure to recognize the risk of turning the valve in light of the “Do Not Operate” tag was a root cause of this situation. Technician failed to follow Gas Standard 1750.010-MA (1/17/2019) and Gas Standard 1170.040 (1/1/2018) in regards to notifying Gas Control before and after performing work at a station. If Gas Control had been notified there would have been more visibility, and the situation may have been mitigated. On 4/19/2019 a revision to GS 1750.010 was published no longer requiring a call to Gas Control unless work is performed on monitored or controlled equipment. The effective date of the revised gas standard is 4/12/2019. The due date in LMS for the review of the change to the standard is June 30, 2019.

When the revised GS 1750.010(MA) “Pressure Regulating Station Operation and Maintenance” is reviewed with individuals, it becomes the effective operating standard for those individuals. The M&R technician has not completed this assignment, and has to June 30, 2019 to do so. Since the M&R technician has not yet completed assignment he is still governed by the original standard dated 1/17/2019, this was a contributing factor.

The trainee did not enter the station with the M&R technician. The M&R technician completed both the Pre-Job Briefing Form and the Vault and Pit Entry Checklist, by himself. If the M&R tech had filled out both forms with trainee, and taken the trainee to observe and participate at the job site, there may have been opportunity to avoid the situation.

The station design as well as the use of the monitor regulator at the 58 psig set point did not keep the downstream pressure below the MAOP plus the 10% allowable build up permissible pursuant to the regulations. While the monitor regulator worked to mitigate the downstream impact, the set point of the monitor regulator, the reaction time before it lowered pressure, as well as the station configuration all contributed to the pressure excursion since the system as a whole did not adequately compensate for human error.

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Figure 3 – New “Do Not Operate” Tag

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What is being done to prevent reoccurrence/lessons learned?

1. Failure to follow gas standards led to improper valve being turned.

Action Item	Responsible Party	Timeline
Senior management to reinforce obligation to follow gas standards at all times, and continually remind all employees of importance of doing so	GM	30 days
QA/QC the M&R technicians to determine if they are following procedure and or require additional training <ul style="list-style-type: none"> • Review Outcome of Station Audit and items identified for follow up 	CJ Anstead Dana Argo	30 days 30 days

2. Entering a station monitored by SCADA requires a call to Gas Control before entering and exiting. All technicians should have a clear understanding of Gas Standard 1750.010 and Gas Standard 1170.040.

Action Item	Responsible Party	Timeline
1750.010 & 1170.040 Gas Standard Review – Supply Compliance with Batch sheets.	Jeff Croke	30 Days

3. Expand on procedures in Gas Standard 1750.010 and Gas Standard 1170.040 to reduce risk when working at a station (gauges).

Action Item	Responsible Party	Timeline
Submit modification to GS 1750.010 (SEAS request needs to be submitted) expanding on procedures (gauges).	Jeff Croke	30 days
Submit SEAS to review GS 1750.010, 1170.040 and 1750.210. Correct any conflict between them. (Calling Gas Control)	Jeff Croke	30 days
GS 1750.010 modified 4/12/2019 removing language about contacting Gas Control when performing work “onsite”. Include in SEAS request to add language back in requiring a call to Gas Control when work is performed on site of a SCADA monitored station. (1) Establish communications between control room representatives, operator’s management, and associated field personnel when planning and implementing physical changes to pipeline equipment or configuration; (2) Require its field personnel to contact the control room when emergency conditions exist and when making field changes that affect control room operations; and (3) Seek control room or control room management participation in planning prior to implementation of significant pipeline hydraulic or configuration changes.	Jeff Croke Gas Standard	30 days

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4. There was no Job order for the shutting off of the catalytic heater at this station. Require a job order when work is performed at a station.

Action Item	Responsible Party	Timeline
Verify RTs created/dates appropriate/process for turning on and off catalytic heater. Work with Engineering for appropriate times during the year. Is there other work that should be included? Review types of work that need specific jo for station work.	Jeff Croke D. Mueller R. Poe	6 months

5. A pre-job briefing was not completed with both technicians on-site. The trainee did not enter the station with the technician. Reviewing the work with the second person and having a second set of eyes to see the “Do not operate” sign would have reduced risk.

Action Item	Responsible Party	Timeline
Create a Pre-Job briefing for M&R Work. Require all parties on-site to review risks.	Jeff Croke Dana Argo	30 days
Create a checklist for jobs within regulation stations	Jeff Croke D. Mueller R. Poe	60 days

6. Although the valve was tagged with “Do Not Operate” it was still turned as the technician thought it was for the catalytic heater.

Action Item	Responsible Party	Timeline
Tagging (possible other methods) of control lines and Painting or other visual indicators on valves, so as to more clearly identify the equipment and operations of the equipment within the station.	Jeff Croke Dana Argo	90 days
Verify and tag catalytic heater valves locations at stations.	Jeff Croke D. Mueller R. Poe	60 days
Review and Modify Training Document CDOPM4H.1 Operating and Maintaining Catalytic Heater Installations to include Seasonal Shut off steps.	Jeff Croke Marie Walker	90 days
Review training material for the proper procedure for proceeding forward on a “DO NOT OPERATE” tag.	Jeff Croke Marie Walker	90 days

7. Notification of event from Gas Control should include the Integration Center

Action Item	Responsible Party	Timeline
Review process with Gas Control and notification to IC (Over/Under Pressurization).	J Tiffner A. Roorda R.Poe	60 DAYS

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8. Could not contact Palmer Fire Department. Review municipal and after hour communications protocol.

Action Item	Responsible Party	Timeline
Educate on Municipalities practices on incidents (reverse 911, town notifications).	Communications	90 Days
Proactive – secure the cell phone numbers for all Fire Chiefs in territory.	Communications	30 Days

9. Monitor took time to respond.

Action Item	Responsible Party	Timeline
Comprehensive review of station. Reconfigure control system.	D. Mueller D. Argo	90 days
Review 3 additional district stations with same cut and reconfigure them if possible.	D. Mueller D. Argo	
Develop plan to investigate and remediate if needed any Gate Stations that also may have similar large cuts in pressure.	D. Mueller D. Argo	