



March 7, 2012

Mr. Chris Hoidal, Director, Western Region  
Pipeline and Hazardous Materials Safety Administration  
12300 W. Dakota Avenue, Suite 110  
Lakewood, CO 80228

Reference: CPF 5-2012-0003M

Dear Mr. Hoidal:

This letter acknowledges your "Notice of Amendment" dated March 1, 2012. Please see our responses to the issues identified in the referenced letter.

**Issue 1 – §192.16 Customer Notification**

(a) This section applies to each operator of a service line who does not maintain the customer's buried piping up to entry of the first building downstream, or, if the customer's buried piping does not enter a building, up to the principal gas utilization equipment or the first fence (or wall) that surrounds that equipment. For the purpose of this section, "customer's buried piping" does not include branch lines that serve yard lanterns, pool heaters, or other types of secondary equipment. Also, "maintain" means monitor for corrosion according to §192.465 if the customer's buried piping is metallic, survey for leaks according to §192.723, and if an unsafe condition is found, shut off the flow of gas, advise the customer of the need to repair the unsafe condition, or repair the unsafe condition.

(b) Each operator shall notify each customer not later than August 14, 1996 or 90 days after the customer first receives gas at a particular location, whichever is later. However, operators of master meters systems may continuously post a general notice in a prominent location frequented by customers.

The City of Long Beach has a process of notifying its customers that it does not maintain the Customers buried piping downstream of their gas meter. However, the procedure is inadequate because the City failed to include the required timeframe for this notification in its Operations and Maintenance (O & M) Manual. Pursuant to §192.16, operators must notify each customer not later than 90 days after the customers first receives gas at a particular location.

**Response: Long Beach Gas Department O & M manual has been amended as follows**

Gas Standard 16: Customer Notification:  
General

Long Beach Gas Department makes every effort to operate and maintain a safe gas distribution system and to make the public aware of potential problems related to natural gas.

## Responsibility

Customers are advised of their respective responsibility for the maintenance of the pipeline (e.g. houseline, yard line) beyond the meter set assembly within 90 days after the customer first receives gas (start of service).

The Department administers the program of distributing information to Long Beach Gas customers.

## Procedure

This information is provided in a variety of ways including:

- Citywide information is frequently included in monthly bills,
- Yearly mail out of calendars that provide safety related information
- At time of "new service request" new customers are contacted via direct mail once an account is opened with Long Beach Gas Department identifying them of their responsibility.
- LBGO Information pamphlets are mailed to customers who may move within the service territory of Long Beach Gas Department and reestablish an account.
- Gas Services Bureau policy and procedure manual, incorporated by reference - procedure 04-02-31 provides detailed instructions for unsatisfactory conditions as it relates to situations involving natural gas house and yard lines.

## Issue 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 procures for conducting operations and maintenance activities, and for emergency response...

(d) Safety-related condition reports. The manual required by paragraph (a) of this section must include instructions enabling personnel who perform operation and maintenance activities to recognize conditions that potentially may be safety-related conditions that are subject to the reporting requirements of §191.23 of this subchapter.

Although the City of Long Beach has a process of reporting Safety Related Conditions (SRCs), it failed to identify SRCs applicable to its system in the O & M manual. At a minimum, the O & M manual must include procedures to recognize SRCs listed in §191.23 that may be applicable to their pipeline facilities.

Furthermore, the City of Long Beach does not have a process or instructions in their O & M manual enabling individuals who perform operation and maintenance activities to recognize conditions that potentially may be Safety Related Conditions that are subject to the reporting requirements of §191.23.

## **Response: Long Beach Gas Department O & M manual has been amended to respond to the issue of recognition of Safety Related Conditions**

The Gas Department prepares and follows a manual of written procedures for conducting operations and maintenance activities and for emergency response. The Gas Department maintains an O&M manual. This manual is reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. The manual is kept at locations where operations and maintenance activities are conducted. The manual is also web based and can be found on the Department "T" drive under T:\EngrConst\Engineering\O & M Manual\Final O & M plan. This web-based document is available to all personnel within the Gas Department.

Section 605 of the Long Beach O & M manual has been expanded to provide the procedures and processes enabling individuals who perform O & M activities to recognize Safety Related Conditions that require reporting under §191.23

- Field personnel (who are OQ qualified) generate a Pipeline Condition Report (PCR) during all O & M activities where pipeline is exposed. This PCR is sent to engineering for evaluation. The PCR is then filed and kept with the appropriate work, service or repair order.
- If a Safety Related Condition is identified as shown in the table below, the field individual will contact engineering and the following procedures will be enacted. Note that field individuals are OQ to recognize conditions that may require reporting a safety related condition.
- Safety Related Condition reports including accident investigations are also identified in the Emergency Plan shown in appendix C, and gas standard 613 and 617 in the O&M manual.
- Safety Related Condition reports to be submitted to PHMSA will provide the following information
  1. City of Long Beach Gas Department address
  2. Date of report
  3. Name, job title, business phone number of person submitting report
  4. Name, job title, business phone number of person who determined that condition exist
  5. Date condition was discovered and date condition was first determined to exist
  6. Location of condition e.g. street address
  7. Description of condition including circumstances leading to discovery, any significant impact on safety and note that natural gas is the commodity being transported.
  8. Corrective action taken including reduction of pressure or shutdown before report is submitted and planned follow up or future actions including schedule.
- The table below identifies the requirements for reporting to PHMSA for Safety Related Conditions.

Location	Time Factor	Type	Effect on Operation	Report Required
All Service Territory	Will not be corrected within 5 working days after determination or 10 working days after discovery whichever comes first	Unintended Movement or Loading e.g. earthquake.	Impairs serviceability	Yes
		Malfunction or Operating Error	Pressure increases above MAOP + allowable buildup	
		Leak	Creates an emergency	
		All other Conditions	Could lead to imminent hazard and causes a 20% or more pressure reduction or shutdown	

Reference: CPF 5-2012-0003M  
March 7, 2012  
Page 4

The Long Beach Gas Department believes these amendments address your concerns regarding the Operations and Maintenance manual.

Sincerely,

A handwritten signature in black ink, appearing to read "ajw Winter". The signature is written in a cursive style with a large, looping initial "ajw".

Alan J. Winter  
Manager of Engineering and Construction

cc: Chris Gamer

**bcc: Steve Bateman**  
**Phil Carroll**  
**Joan Collier**  
**Dan Colunga**