

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 10, 2012

Mr. Steven Lins
Chief Assistant General Manager
City of Glendale Water & Power
141 N. Glendale Ave.
Glendale, CA 91206

CPF 5-2012-0010M

Dear Mr. Lins:

On November 8, 2011, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected the City of Glendale Water & Power's procedures for the Scholl Canyon Landfill Gas System in Glendale, California.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within City of Glendale Water & Power plans or procedures, as described below:

1. §192.615 Emergency Plans

(a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:

(5) Actions directed toward protecting people first and then property.

The City of Glendale Operations and Maintenance (O&M) Manual did not clearly indicate actions in its Emergency Procedures to protect people first and then property. The Emergency Procedures must be revised to be clear that protection of people is first.

2. §192.287 Plastic pipe: Inspection of joints.

No person may carry out the inspection of joints in plastic pipes required by §§ 192.2739(c) and 192.285(b) unless that person has been qualified by appropriate training or experience in evaluating the acceptability of plastic pipe joints made under the applicable procedures.

The City of Glendale O&M Manual did not explicitly require a qualified individual inspect high density PE fusion bonds. The O&M manual must be revised to include inspection of fusion bonds. The City of Glendale must have a qualified person inspect and accept the fusion bond whether done by operator personnel or their contractor.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance 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). 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 a Final Order.

If, after opportunity for a hearing, 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 C.F.R. § 190.237). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 60 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 City of Glendale Water & Power maintains documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Chris Hoidal, Director, Western Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 5-2012-0010M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Chris Hoidal
Director, Western Region
Pipeline and Hazardous Materials Safety Administration

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

cc: PHP-60 Compliance Registry
PHP-500 P. Nguyen (#135569)