



January 22, 2015

Mr. Chris Hoidal  
Director, Western Region  
Pipeline and Hazardous Materials Safety Administration  
Reference: CPF 5-2014-0007M

Dear Mr. Hoidal:

This letter is in response to the "Notice of Amendment" letter CPF 5-2014-0007M, dated December 9, 2014, received at my office on December 15, 2014. I am pleased to advise you that I am not contesting the Notice of Amendment issues listed. Attached is a copy of Victorville's Distribution Integrity Management Program (DIMP) with the most recent amendments.

In summary, the City of Victorville's Distribution Integrity Management Plan has been amended to address the issues identified in your letter. Below are brief responses to the three (3) inadequacies found during the inspection of the City of Victorville's DIMP during the week of October 21-24, 2013:

1. 192.1007 What are the required elements of an Integrity Management Plan?

A written Integrity Management Plan must contain procedures for developing and implementing the following elements:

- (a) Knowledge. An operator must demonstrate an understanding of its gas distribution system developed from reasonably available information.
- (3) Identify additional information needed and provide a plan for gaining that information over time through normal activities conducted on the pipeline (for example, design, construction, operation or maintenance activities).

The City of Victorville's DIMP did not adequately identify additional information needed nor provide a plan to fill information gaps that could be used to increase the knowledge of its pipeline system, i.e. Chapter 11.1, Section C. The DIMP did not show consideration for the unknown or missing pressure test documentation from Chapter 11.2. . . ."Has the pipe/component on this section been pressure tested in accordance to Part 192, subpart J? . . ."

Response

- Chapter 11.1, page 24, paragraph C of the amended DIMP now states "If located by electronic line locators or documentation, the facility will be potholed for verification." Due to the fact that the City of Victorville acquired the distribution system from the United States Air Force, and no pressure testing documentation was provided at the time of the transfer of the asset, the system will remain at the current pressure, and that will be the established MAOP.
- Chapter 11.2, page 43, of the amended DIMP states "The City of Victorville acquired the natural gas distribution system from the United States Air Force during 2005. The City was not provided pressure testing records at the time of the transfer of ownership for the gas distribution system; therefore, it cannot be verified if the existing gas distribution system was pressure tested, or not." All pipe installed by the City of Victorville has been installed and pressure tested in accordance with CFR part 192.

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2. 192.1007 What are the required elements of an Integrity Management Plan?

A written Integrity Management Plan must contain procedures for developing and implementing the following elements:

- (a) Identify threats. The operator must consider the following categories of threats to each gas distribution pipeline: corrosion, natural forces, excavation damage, other outside force damage, material or welds, equipment failure, incorrect operations, and other concerns that could threaten the integrity of its pipeline. An operator must consider reasonably available information to identify existing and potential threats. Sources of data may include, but are not limited to, incident and leak history, corrosion control records, continuing surveillance records, patrolling records, maintenance history, and excavation damage experience.

The City of Victorville's DIMP did not adequately indicate sources of data that must be considered in identifying existing and potential threats. The written plan did not provide data sources for atmospheric corrosion and internal corrosion threats.

Response

- Chapter 4, paragraph 4.2, pages four (4) through 10 of the City's amended DIMP addresses the requirement to identify threats to the City's gas pipeline.

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3. 192.1007 What are the required elements of an Integrity Management Plan?

A written Integrity Management Plan must contain procedures for developing and implementing the following elements:

- (a) Identify and implement measures to address risks. Determine and implement measures designed to reduce the risks from failure of its gas distribution pipeline. These measures must include an effective leak management program (unless all leaks are repaired when found).

The City of Victorville's DIMP did not provide adequate procedures for an effective leak management program. The O&M Manual Section J "Leakage Procedures" referenced in the DIMP did not address routine self-assessment of the overall leak management plan.

Response

- Chapter 6.1 & 6.2, pages 14 and 15, in Victorville's amended DIMP, addresses the requirement to provide adequate procedures for an effective leak management program.
- Chapter 8, page 18, of Victorville's amended DIMP, identifies the re-evaluation of the plan to take place no less than every five (5) years.

There were no safety improvement costs associated with preparing/revising the City of Victorville's DIMP to fulfill this Notice of Amendment. Please contact me should you have any questions regarding this response letter.

Sincerely,



Joe Flores  
Public Works Manager  
City of Victorville

Enclosure:  
Distribution Integrity Management Plan, for City of Victorville