

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

August 31, 2016

Mr. Peter Preciado
Public Works and Utilities Director
City of Coalinga
155 West Durian Avenue
Coalinga, CA 93210

CPF 5-2016-0013M

Dear Mr. Preciado:

On November 16-19, 2015, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected the City of Coalinga's (Coalinga) Natural Gas Distribution System procedural manual for operations, maintenance, and emergencies in Coalinga, CA. On the basis of the inspection, PHMSA has identified the apparent inadequacies found within Coalinga's plans or procedures, as described below:

- 1. § 192.287 Plastic pipe: Inspection of joints.**
No person may carry out the inspection of joints in plastic pipes required by §§ 192.273(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 joining procedure.

The City of Coalinga's Operations and Maintenance (O&M) Manual did not contain procedures explicitly addressing the process to assure person(s) who carry out the inspection of joints in plastic pipe were qualified by appropriate training or experience in evaluating the acceptability of plastic pipe joints made under the applicable joining procedure.

2. **§ 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:**
 - (9) **Safely restoring any service outage.**

Coalinga's O&M Manual did not have written procedures addressing the restoration of services after an outage. The procedures must include steps to safely restore any service outages to their customers following an emergency.

3. **§ 192.615 Emergency plans.**
 - (b) **Each operator shall:**
 - (3) **Review employee activities to determine whether the procedures were effectively followed in each emergency.**

Coalinga's O&M Manual did not contain the process to review employee activities post emergency to determine whether the emergency procedures were effectively followed.

4. **§ 192.615 Emergency plans.**
 - (c) **Each operator shall establish and maintain liaison with appropriate fire, police, and other public officials to:**
 - (1) **Learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency;**
 - (2) **Acquaint the officials with the operator's ability in responding to a gas pipeline emergency;**
 - (3) **Identify the types of gas pipeline emergencies of which the operator notifies the officials; and**
 - (4) **Plan how the operator and officials can engage in mutual assistance to minimize hazards to life or property.**

The City of Coalinga did not have a process to establish and maintain liaison with appropriate fire, police, and other public officials per Part 192.615(c). Written records to demonstrate periodic liaison meetings were not maintained. During the inspection, the last recorded meeting specific to this emergency plan requirement indicated it was held in 2009.

5. **§ 192.616 Public awareness.**
 - (c) **The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.**

Coalinga did not have a process to address the effectiveness of its public awareness program. Specifically the public awareness program did not have a written justification in its procedural manual for not performing the measurement of its effectiveness.

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 the City of Coalinga Natural gas System maintain 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 5-2016-0013M** and, for each document you submit, please provide a copy in electronic format to 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 Nicolas Cruz (#151443)