



October 13, 2021

Via email to: dustin.hubbard@dot.gov

ATTN: Dustin Hubbard
Director, Western Region, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
12300 W. Dakota Avenue, Suite 110
Lakewood, Colorado, 80228

RE: CPF 5-2021-037-NOPV

Dear Mr. Dustin Hubbard,

The City of Glendale, Glendale Water & Power ("City") provides the following responses to your letter dated September 17, 2021 regarding CPF 5-2021-037-NOPV.

Item #2 Proposed Compliance Order A.

- *Option #2 (The City does NOT contest the allegations, but provides an EXPLANATION relevant to the proposed compliance order)* – As stated in the proposed violation the City did not send out the required mailers. In order to perform the required 4-year effectiveness evaluation the feed back from those mailers would be required. As such, a four-year effectiveness evaluation cannot be completed within 180 days of a Final Order. The City requests that the Compliance Order be modified to require a 4-year effectiveness evaluation once four years of mailers have been completed. In addition, this line is currently out of service, filled with nitrogen, and disconnected on both ends. It has met the requirements of an abandoned line and its likely this abandonment will become official in the next couple of months. The City requests that the Compliance Order also be modified to recognize that if the line is officially abandoned prior to the Compliance Order deadline then the Compliance Order shall not be required.

Item #3 Proposed Compliance Order B.

- *Option #2 (The City does NOT contest the allegations, but provides an EXPLANATION relevant to the proposed compliance order)* – The line is currently out of service, filled



CITY OF GLENDALE, CALIFORNIA

Management Services

613 E. Broadway, Suite 200

Glendale, CA 91206-4308

Tel. (818) 548-4844 Fax (818) 547-6740

glendaleca.gov

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Item #4 Proposed Compliance Order C.

- *Option #2 (The City does NOT contest the allegations, but provides an EXPLANATION relevant to the proposed compliance order)* – The line is currently out of service, filled with nitrogen, and disconnected on both ends. It has met the requirements of an abandoned line and its likely this abandonment will become official in the next couple of months. The City requests that the Compliance Order be modified to recognize that if the line is officially abandoned prior to the Compliance Order deadline then the Compliance Order shall not be required.

Item # NONE Proposed Compliance Order D.

- *Option #2 (The City does NOT contest the allegations, but provides an EXPLANATION relevant to the proposed compliance order)* – The line is currently out of service, filled with nitrogen, and disconnected on both ends. It has met the requirements of an abandoned line and its likely this abandonment will become official in the next couple of months. The City requests that the Compliance Order be modified to recognize that if the line is officially abandoned prior to the Compliance Order deadline then the Compliance Order shall not be required.

If you should you have any questions, please feel free to contact Mr. Mark Young at 818-548-2107 or Mr. Rostamik Chetin at 818-548-3399.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. Golanian", is written over the typed name.

Roubik Golanian, City Manager
City of Glendale
613 E. Broadway, Room 200
Glendale, CA 91206-4391

cc: Mark Young, General Manager - Glendale Water & Power
Rostamik Chetin, Mechanical Engineer II