



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228

WARNING LETTER

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 5, 2007

Mr. Wayne Campbell
City of Victorville
14343 Civic Drive
Victorville, CA 92392-2399

CPF 5-2007-0008W

Dear Mr. Campbell:

On September 18, 2006, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected your distribution gas system in Victorville, California.

As a result of the inspection, it appears that you have committed probable violations of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violation(s) are:

1: §192.721 Distribution systems: Patrolling.

(b) Mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled -

(1) In business districts, at intervals not exceeding 4 1/2 months, but at least four times each calendar year.

The distribution system does not serve any residential customers, only businesses. Since it took over the operation The City of Victorville natural gas employees failed to patrol its distribution system, since it took over the operation, in business districts while there are construction activities.

2. **§192.723 Distribution systems: Leakage surveys.**

(b) The type and scope of the leakage control program must be determined by the nature of the operations and the local conditions, but it must meet the following minimum requirements:

(1) A leakage survey with leak detector equipment must be conducted in business districts, including tests of the atmosphere in gas, electric, telephone, sewer, and water system manholes, at cracks in pavement and sidewalks, and at other locations providing an opportunity for finding gas leaks, at intervals not exceeding 15 months, but at least once each calendar year.

The City of Victorville's staff failed to conduct leak detection surveys in business districts.

3. **§192.747 Valve maintenance: Distribution systems.**

(a) Each valve, the use of which may be necessary for the safe operation of a distribution system, must be checked and serviced at intervals not exceeding 15 months, but at least once each calendar year.

The City of Victorville's staff failed to conduct valve inspections on its two main line valves that are connected to Southwest Gas facilities.

4. **§192.481 Atmospheric corrosion control: Monitoring.**

(a) Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows: If the pipeline is located Onshore: Then the frequency of inspection is: at least once every 3 calendar years, but with intervals not exceeding 39 months.

The system is mostly made of plastic except the above ground tie-ins to Southwest Gas. These tie-ins are made of steel and the City of Victorville's staff failed to monitor atmospheric corrosion at these two locations. It should be noted that no evidence of atmospheric corrosion was observed.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$100,000 for each violation for each day the violations persists up to a maximum of \$1,000,000 for any related series of violations. Also, for LNG facilities, an additional penalty of not more than \$50,000 for each violation may be imposed. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item(s) identified in this letter. Failure to do so will result in City of Victorville being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 5-2007-0008W**. 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).

Sincerely,



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

cc: PHP-60 Compliance Registry
PHP-500 F. F. Monfared, (#116775)