



Your Trusted Community Utility

ADMINISTRATION

April 24, 2012

Mr. Chris Hoidal
Director, Western Region
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228

Subject: Response to NOTICE OF AMENDMENT – CPF 5-2012-0010M

Dear Mr. Hoidal:

In reference to the Notice of Amendment letter, CPF 5-2012-0010M, received by the City of Glendale Water & Power (City) on April 16, 2012, the City acknowledges the apparent inadequacies found within our Scholl Canyon Landfill Gas Plant: Operations and Maintenance (O&M) Manual regarding the following subsections of the Code of Federal Regulations 49 Part 192:

- 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 the following:
 - (5) Actions directed toward protecting people first and then property.

2) §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 procedures.

On behalf of the City, we will duly take the necessary actions to update and revise our current Scholl Canyon Landfill Gas Plant: O&M Manual to clearly indicate actions in its Emergency Procedures to protect people first and then property, and to explicitly require a qualified individual to inspect and accept high density PE fusion bonds in its Inspection of Pipeline Joints.

Sincerely,

Steven G. Lins
Chief Assistant General Manager
City of Glendale Water & Power

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