

## WARNING LETTER

### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

May 14, 2012

Mr. Craig C. Platt  
Public Works Director  
City of Susanville  
66 N. Lassen St.  
Susanville, CA 96130

CPF 5- 2012-0012W

Dear Mr. Platt:

On March 19-21, 2012, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected your natural gas pipeline system in Susanville, California.

As a result of the inspection, it appears that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The item inspected and the probable violation is:

- 1. §191.13 Distribution systems reporting transmission pipelines; transmission or gathering systems reporting distribution pipelines.**

**Each operator, primarily engaged in gas distribution, who also operates gas transmission or gathering pipelines shall submit separate reports for these pipelines as required by §§ 191.15 and 191.17. Each operator, primarily engaged in gas transmission or gathering, who also operates gas distribution pipelines shall submit separate reports for these pipelines as required by §§ 191.9 and 191.11.**

At the time of the inspection, annual reports filed by the City of Susanville for its municipal gas system did not separately report the gas transmission system supplying its distribution system, as well as two large-volume customers – a power plant and a correctional facility. A separate annual report should have been filed for the approximately 10.75 miles of 6” coated-steel, cathodically-protected transmission line, operating at approximately 340 pounds per square inch gauge (PSIG), with a maximum allowable operating pressure (MAOP) of 1000 PSIG.

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 violation persists up to a maximum of \$1,000,000 for any related series of violations. 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 the City of Susanville 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 5-2012-0012W**. 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,

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

cc: PHP-60 Compliance Registry  
PHP-500 J. Stahoviak (#138162)