

## NOTICE OF AMENDMENT

### CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 9, 2014

Mr. Joe Flores  
Public Works Manager  
City of Victorville  
P.O. Box 5001  
Victorville, CA 92392

**CPF 5-2014-0007M**

Dear Mr. Flores:

On October 21-24, 2013, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code inspected City of Victorville's procedures and records for their Distribution Integrity Management Program (DIMP) in Victorville, California.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within City of Victorville's plans, as described below:

**1. 192.1007 What are the required elements of an integrity management plan?**

**A written integrity management plan must contain procedures for developing and implementing the following elements:**

- (a) Knowledge. An operator must demonstrate an understanding of its gas distribution system developed from reasonably available information.**
- (3) Identify additional information needed and provide a plan for gaining that information over time through normal activities conducted on the pipeline (for example, design, construction, operations or maintenance activities).**

City of Victorville's DIMP Plan did not adequately identify additional information needed and provide a plan to fill information gaps that could be used to increase the knowledge of its pipeline system. The City of Victorville appears to be using the online tool SHRIMP, that was developed by The American Public Gas Association to help create their DIMP Plan, but information gaps about their distribution system persist. For example, the DIMP Plan in Chapter 11.2 stated "Has the pipe/component on this section been pressure tested in accordance to Part 192, Subpart J? I don't know." This statement reveals a gap in knowledge. A second example is in DIMP Plan Chapter 11.1, Section C, which stated "The following gaps identified by City of Victorville: City of Victorville will implement as follows: No additional information needed." The DIMP Plan did not show consideration for the unknown or missing pressure test documentation from Chapter 11.2 (List of answers and data sources from SHRIMP interviews). City of Victorville must amend its DIMP Plan to address information gaps and develop a process to collect the information over time.

**2. 192.1007 What are the required elements of an integrity management plan?**

**A written integrity management plan must contain procedures for developing and implementing the following elements:**

**(b) Identify threats. The operator must consider the following categories of threats to each gas distribution pipeline: corrosion, natural forces, excavation damage, other outside force damage, material or welds, equipment failure, incorrect operations, and other concerns that could threaten the integrity of its pipeline. An operator must consider reasonably available information to identify existing and potential threats. Sources of data may include, but are not limited to, incident and leak history, corrosion control records, continuing surveillance records, patrolling records, maintenance history, and excavation damage experience.**

City of Victorville's DIMP Plan did not adequately indicate sources of data that must be considered in identifying existing and potential threats. The written plan did not provide data sources for atmospheric corrosion and internal corrosion threats. Further, there was incorrect data input or missing data identified in the threat assessment as part of the SHRIMP interviews. Incorrect data input or missing data could affect threat assessment and risk ranking. City of Victorville must re-evaluate its threat assessment, considering all reasonably available information to identify existing and potential threats, and determine any changes to the risk ranking.

**3. 192.1007 What are the required elements of an integrity management plan?**

**A written integrity management plan must contain procedures for developing and implementing the following elements:**

**(d) Identify and implement measures to address risks. Determine and implement measures designed to reduce the risks from failure of its gas distribution pipeline. These measures must include an effective leak management program (unless all leaks are repaired when found).**

City of Victorville's DIMP Plan did not provide adequate procedures for an effective leak management program. O&M Manual Section J "Leakage Procedures" referenced in the DIMP Plan did not address routine self-assessment of the overall leak management plan. City of Victorville must self-assess to determine if additional actions are necessary to keep people and

property safe. City of Victorville must amend its procedures to include the self-assess element of an effective leak management program.

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 **45** 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 City of Victorville 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 5-2014-0007M** and, for each document you submit, please provide a copy in electronic format 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 C. Ishikawa (#144260)