

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

June 7, 2016

Mr. Dan Newton
Public Works Director
City of Susanville
720 South Street
Susanville, CA 96130

CPF 5-2016-0005M

Dear Mr. Newton:

On December 15-17, 2015, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code inspected The City of Susanville's Gas System (Susanville) procedures for Operations and Maintenance in Susanville, CA. Both the Susanville Transmission and Distribution pipelines were inspected.

On the basis of the inspection, PHMSA has identified the apparent inadequacies found within Susanville's plans or procedures for maintaining your Transmission systems, as described below:

1. **§192.459 External corrosion control: Examination of buried pipeline when exposed.**

Whenever an operator has knowledge that any portion of a buried pipeline is exposed, the exposed portion must be examined for evidence of external corrosion if the pipe is bare, or if the coating is deteriorated. If external corrosion requiring remedial action under Secs. 192.483 through 192.489 is found, the operator shall investigate circumferentially and longitudinally beyond the exposed portion (by visual examination, indirect method, or both) to determine whether additional corrosion requiring remedial action exists in the vicinity of the exposed portion.

The Susanville Operations and Maintenance Plan does not contain procedures explicitly requiring exposed pipe be examined for evidence of corrosion or coating deterioration, completing and documenting any findings or required remedial action in accordance with §192.459.

2. **§192.233 Miter joints.**

- (a) **A miter joint on steel pipe to be operated at a pressure that produces a hoop stress of 30 percent or more of SMYS may not deflect the pipe more than 3°.**
- (b) **A miter joint on steel pipe to be operated at a pressure that produces a hoop stress of less than 30 percent, but more than 10 percent of SMYS may not deflect the pipe more than 12 1/2° and must be a distance equal to one pipe diameter or more away from any other miter joint, as measured from the crotch of each joint.**
- (c) **A miter joint on steel pipe to be operated at a pressure that produces a hoop stress of 10 percent or less of SMYS may not deflect the pipe more than 90°.**

The City of Susanville O&M Manual allows installation of miter joints on transmission lines and mains with the permission the engineer. This procedure language is vague as to which engineer will approve, how much miter is allowed per joint and under what circumstances miter joints will be allowed. §192.233 is prescriptive and must be followed if miter joints are allowed to be installed in a gas pipeline. Susanville must incorporate the requirements of §192.233 if they intend to allow miter joints.

Distribution System

Please note that Items 1 and 2 also apply to your Distribution system pipelines. PHMSA will address these same items in a similar but separate letter.

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 sixty (60) 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 The City of Susanville Gas System 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 5-2016-0005M** 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

cc: PHP-60 Compliance Registry
PHP-500 Jason Dunphy (#148382)

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*