October 28, 2016

Chris Hoidal, Director Western Region
Pipeline and Hazardous Material Safety Administration
12300 W. Dakota Ave., Suite 110
Lakewood, CO 80226

Re: City of Susanville Notice of Amendment

Dear Mr. Hoidal:

In reference to the Notice of Amendment CPF 5-2016-0007M, the City of Susanville has addressed the inadequacies in the notice, as indicated below:

- Item 1 - 192.459 External corrosion control: Examination of buried pipeline when exposed. Language has been added in section L-2 of Operations and Maintenance Plan as indicated in attachment A.
- Item 2 - 192.233 Miter Joints. Language has been added in section D-2, 2.7 of Operations and Maintenance Plan as indicated in attachment B.

Sincerely,

[Signature]

Dan Newton, PE
Public Works Director

Enclosures: Attachment A – Procedures L-2
Attachment B – Procedures D-2
PROCEDURES
PIPELINE FACILITIES INSPECTION

2.0 PURPOSE

Regular inspection of gas pipeline and pipeline facilities is an essential means of maintaining pipeline integrity.

The purpose of this section is to identify the inspection requirements and methods to be implemented.

2.1 EXTERNAL INSPECTION

A. Existing Facilities

1. Whenever the operator has knowledge that any portion of buried pipeline is exposed, the exposed portion must be examined for evidence of external corrosion if the pipe is bare, if the coating is deteriorated. If external corrosion requires remedial action under 192.483 through 192.489. 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 vicinity of exposed portion.

2. If signs of corrosion are present a test shall be formed to determine the remaining wall thickness, use L-8 procedures for wall thickness
   a. If pipe coating is removed or pipe is bare, a pipe to soil potential reading will be taken and recorded.
   b. Acceptable range, - 0.85 volts to - 2.85 volts
   c. EXCEPTION: When vacuum-extraction excavation method is used, opening only a small diameter excavation and the protective coating is not removed or damaged. Exceptions to recording a pipe to soil reading should be documented.

3. Recorded pipe to soil readings for steel or other metallic pipe activity on the appropriate form, (Work and Repair Report)

4. Contractors are responsible for taking and documenting pipe to soil readings whenever exposing and removing protective coating from steel or other metallic pipe.

5. Gas Operator personnel are responsible for the review of pipe to soil data and initiating any appropriate remedial action in accordance with operator’s procedures.

6. Pipe-to-Soil readings that fall outside of the acceptable range, -0.85 to -2.85, shall be immediately forwarded along with the appropriate documentation to the Gas Supervisor or designee to ensure prompt remedial action.
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7. The condition found for the pipe, fitting, and/or coating shall be recorded on the appropriate form(s).

B. New or Replacement Installation
   1. Prior to lowering coated steel pipe into the excavation, all pipe coating shall be visually inspected for defects.
   2. All welds that are field wrapped shall be visually inspected prior to installation.
   3. Electronic holiday inspection shall be preformed prior to initial installation of any steel pipeline.
   4. All holidays in the coating shall be repaired and re-inspected prior to installation.
   5. During inspection, ensure that the entire circumference of pipe has been checked.
   6. The condition found for the pipe, fitting, and/or coating shall be recorded on the appropriate form(s).

C. Use only approved underground coatings for pipe to be buried, and approved above ground coating or paint (UV Protective) for pipe to be suspended or otherwise installed above ground.

2.2 INTERNAL INSPECTION

A. Any time steel pipe is removed from the system or the pipe is tapped and a coupon is captured, the interior surface of the pipe shall be examined and all information about the location and condition shall be recorded on the appropriate form. (Twice each year whenever possible)

B. Coupons that do not show any signs of corrosion may be discarded only after the appropriate operator personnel have reviewed the facility and documentation.

C. Discarded coupons shall not be left in the trench.

D. Coupons exhibiting signs of corrosion shall be immediately forwarded along with the appropriate documentation to the Gas Supervisor or designee to ensure prompt remedial action.

2.3 ATMOSPHERIC CORROSION

A. The Operator will evaluate one third (1/3) of the system annually, and shall cover the entire system once every three years, inspecting for signs of atmospheric corrosion.
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This inspection shall include all above ground metallic facilities. (MSA’s, suspended crossings, pressure reducing stations, etc.)

B. Signs of atmospheric corrosion include discolored and/or peeling paint, evidence of rust or oxidation of the metal surface, and any other condition that the operator believes may require remedial action.

C. If any evidence of atmospheric corrosion is identified, that portion of metallic pipe and/or appurtenance shall be thoroughly cleaned, and painted or coated with approved-for above the ground, ultra violet light resistant, paint or coating.

Note: Most paints and wraps work best within a defined temperature range. Follow manufacturer’s directions for application.

D. Surveys, along with appropriate remedial action shall be documented.

E. Above ground facilities showing signs of heavy rust or pitting, shall be reported immediately along with the appropriate documentation to the Gas Supervisor or designee to ensure prompt remedial action. Repair or replace as soon as practical.

F. Use only approved for above ground, UV protective, coating or paint for pipe to be suspended or otherwise installed above ground.

G. The condition found for the pipe, fitting, and/or coating shall be recorded on the appropriate form(s).
PROCEDURES
STEEL PIPE HANDLING AND CARE

2.0 PURPOSE

All steel pipe shall be handled in such a safe way as to protect the pipe and pipe coating from unnecessary damage.

2.1 SCOPE

A. Pipe Handling
B. Care of pipe and coating
C. Inspection

2.2 HAULING PIPE

A. When hauling pipe on a truck or trailer, the pipe shall be securely fastened to the vehicle so as not to allow the pipe to move when the vehicle is starting, turning, or braking.

B. Pipe shall be padded or on skids, and strapped as not to damage the pipe.

2.3 UNLOADING PIPE

A. Steel pipe greater than 2" in size shall be unloaded by the use of mechanical lifting device. The pipe shall not be turned loose to roll down the skids.

B. Signals used during the process of unloading shall be given by only one person in order to avoid confusion.

C. Pipe retaining stakes shall remain in place on the truck or trailer body until the bottom layer of pipe is to be unloaded.

2.4 LIFTING

A. Extreme caution shall be exercised when pipe is lifted. Be sure there is a clearance between the pipe and any other object to prevent injury.

B. When lifting, take a firm grip, secure good footing, place feet a comfortable distance apart, bend knees, keep back straight, and lift with leg muscles.
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C. Do not twist or rotate the spine to set a load down or pick the load up. If the load is to be carried, keep the spine straight and move the feet.

D. Get help when needed. Use cranes or hoists to lift heavy loads.

E. Use gloves or other hand protection as required when handling materials.

F. Never carry a load in such a way that it obstructs the vision.

G. Use nylon straps or slings when unloading.

2.5 PIPE STORAGE

A. Care shall be taken in the storage of coated pipe.

1. Storage of coated pipe shall not be in areas where gravel, rocks or pavement could damage or penetrate the coating.

2. Storage shall be on wooden strips not less than 4" wide for 2" pipe and not less than 6" wide for 4" and larger pipe.

3. Storage on roadsides, right-of-ways, or projects shall be on padding to prevent damage to the coating.

4. Yard storage shall be done in a way to protect the pipe coating from undue exposure to ultraviolet rays

B. The material delivery truck shall follow the precautions listed above for storage. In addition, the following special procedures must be followed:

1. The coated pipe will be laid on wooden strips to eliminate damage to the coating by residue of gravel and cold patch on the bed of the truck.

2. Sufficient bedding shall be placed on top of the pipe to prevent damage to the pipe coating when the load is tied down.

C. The following equipment shall be used for loading and unloading coated pipe:
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1. A 4" or wider rope or belt sling.
2. A "fitted" pipe clamp.
3. A spreader which grips each end of the pipe with aluminum inserts.
4. At no time shall a chain sling or steel wire rope be used to lift or move coated pipe.

2.6 PIPE STRINGING

Coated pipe which is stockpiled or strung along trench side shall be supported on wooden blocks to hold the pipe off the ground.

Bare or coated pipe shall not be rolled from stringing trucks or handled in any manner which would distort the round form of the ends or scratch, scar or dent the pipe.

Pipe stringing shall be done in such a manner as not to cause a hazard to, or be subjected to possible damage by traffic.

No private drives shall remain blocked overnight, and inform customers of limited access.

2.7 PIPE BENDING

Horizontal and vertical bends may be accomplished by one of three methods:
1. Welded steel elbows
2. Mechanical bending
3. Sagging
4. Miter Joints shall not be used

Refer to Section E-9 for bending procedures

2.8 INSPECTION

All pipe will be visually inspected during unloading for damage to the pipe or coating. Any damage to the pipe structure that would be detrimental to the integrity of the facility will be removed or repaired.