



PUBLIC UTILITIES DEPARTMENT
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August 28, 2018

Kim West
Director, Western Region
Pipeline and Hazardous Materials Safety Administration
12300 W. Dakota Ave., Suite 110
Lakewood, CO 80288

Email: kim.west@dot.gov

Re: CPF 5-2018-0006M

Dear Ms. West:

The following is City of Vernon's response to Notice of Amendment CPF 5-2018-0006M, dated August 2, 2018. Vernon hereby submits amended procedures as follows, all of which are contained in Vernon's Operations and Maintenance (O&M) Manual. The O&M Manual is also included with this response. It was revised in October 2017 following Vernon's receipt of PHMSA's preliminary findings from the compliance inspection.

1. Miter joints. Vernon's O&M Manual now includes the following statement on page 10.

D. Miter Joints

Pursuant to §192.233, miter joints require certain conditions be met. The Vernon gas system does not contain miter joints.

2. Incident reporting, time frame. Vernon's O&M Manual now has expanded language on pages 16 and 17. The revised language specifies that notification shall be made at the earliest practical moment following the occurrence, but not later than one hour. (§192.605)

Notice shall be made by telephone to the National Response Center at:

By phone: 800-424-8802

Electronically: <http://www.nrc.uscg.mil>

Such notification shall be made at the earliest practicable moment following the occurrence, but not later than one hour, and shall include:

1. *Name and contact information for Operator*
2. *The location of the leak*
3. *The time of the leak-caused incident*
4. *The fatalities and personal injuries, if any*
5. *All other significant facts that is relevant to the cause or extent of the damages*

Exclusively Industrial

3. Incident reporting, safety-related condition. Vernon's O&M Manual now has language that specifies Safety-Related Condition Reports to be filed by electronic mail or facsimile. (§192.605) The following language is on page 17 of Vernon's O&M Manual.

In the event that a safety related condition is not corrected in accordance with existing safety standards within five days of the City of Vernon Public Utilities Director being notified of it or within ten days of initial discovery, a "Safety-Related Condition Report" must be filed, and transmitted by electronic mail to InformationResourcesManager@dot.gov, or by facsimile at (202) 366-7128.

4. Reporting construction events. Vernon's O&M Manual now has language that specifies a process to report events listed in §191.22(c). It is on page 18 under Section F. National Registry, on page 18.

PHMSA must be notified when specified changes are made to a pipeline system. The full list can be found at §191.22. However, none are likely to apply because of the relatively small size of Vernon's gas system.

In the event of a change of operation identified in §191.22, Vernon shall report to PHMSA and/or the National Pipeline Mapping System (as appropriate) using OPID 31955.

This completes Vernon's response to CPF 5-2018-0006M.

Sincerely,



Kelly Nguyen
General Manager of Vernon Public Utilities

Attachment: City of Vernon Natural Gas Operations and Maintenance Plan, October 2017