

VIA UPS OVERNIGHT

March 15, 2021

Mr. Dustin B. Hubbard  
Director, Western Region  
PHMSA, Office of Pipeline Safety  
12300 W. Dakota Ave., Suite 110  
Lakewood, CA 80228

Re: CPF 5-2021-012-NOA

Dear Mr. Hubbard:

The City of Long Beach Energy Resources (LBER), formerly identified as Long Beach Gas & Oil (LBGO) has received your February 19, 2021 letter regarding NOTICE OF AMENDMENT (NOA), resulting from the August 31 through September 4, 2020 Pipeline Hazardous Materials Safety Administration (PHMSA) Inspection of LBER procedures for operations and maintenance (O&M) of its natural gas distribution system.

LBER has completed an internal review of internal procedures in order to fully and completely respond to PHMSA's allegations.

1. **§192.605 Procedural manual for operations, maintenance, and emergencies.**
  - (a) ...
  - (b) **Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.**
    - (1) **Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and subpart M of this part.**

"LBGO's Gas Operations and Maintenance (GO&M) procedures, Section No. Maint-3.2, Gas Odorization, describes the process LBGO uses to ensure the appropriate odorant levels are contained in the natural gas provided to LBGO customers, in accordance with §192.625. Section 4.10 addresses, "Personnel performing sniff tests," but does not include any procedures regarding activity restrictions prior to personnel performing such tests. The manufacturer of the odorant testing equipment recommends the operator follow ASTM D6273-14, Standard Test Methods for Natural Gas Odor Intensity. This standard includes activity restrictions, specifically regarding eating and drinking, for personnel performing odorant tests because such activities can impact the effectiveness of sniff tests. LBGO,



however, failed to include such restrictions in its GO&M procedures. It is recommended that LBGO include the activity restrictions in ASTM D6273-14 for performing odorant tests in the O&M procedures, including a minimum time after a restricted activity before personnel can perform a sniff test in order to ensure the test is effective.”

LBER has amended MAINT. 3.2 – Gas Odorization, Section 4.10<sup>1</sup> to reflect activity restrictions before performing sniff tests.

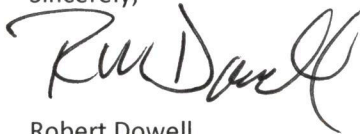
2. §192.605 Procedural manual for operations, maintenance, and emergencies.
  - (a) ...
  - (b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.
    - (1) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and subpart M of this part.

“Section No. 1.2. of the GO&M procedures addresses “Vault Maintenance of vaults having a volume of 200 cubic feet or more.” This section describes inspection and maintenance of vaults, as well as the requirements for housing equipment in vaults. There is no provision, however, within the GO&M procedure to address abnormal operation conditions, such as when a vault is submerged under liquids or when a vault contains liquids or hazardous materials. It is recommended that LBGO amend its vault maintenance procedures to address abnormal operating conditions, including the issues of submerged vaults and of vaults containing liquids or hazardous materials to assure safe operation of LBGO’s pipeline facilities.”

LBER has revised MAINT. 1-2 – Vault Maintenance, Section 6.0<sup>2</sup> to address procedures with abnormal operating conditions.

Should you have any questions on these matters, please do not hesitate to contact me at (562) 570-2001.

Sincerely,



Robert Dowell  
Director, Long Beach Energy Resources

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<sup>1</sup> See Attachment A: O&M MAINT. 3.2 – Gas Odorization, Section 4.10

<sup>2</sup> See Attachment B: O&M MAINT. 1.2 – Vault Maintenance, Section 6.0