

CITY OF LONG BEACH



DEPARTMENT

CHRISTOPHER J. GARNER
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June, 2009 CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Chris Hoidal
Director of Western Region
Office of Pipeline Safety
12300 W. Dakota Ave., Suite 110
Lakewood, CO 80228

Reference: CPF No. 5-2005-0029

Dear Mr. Hoidal:

This letter is our updated response to the issues identified in your Proposed Compliance Order and Notice of Amendment" dated December 28, 2005.

Proposed Compliance Order to meet the requirements of:
192.605 (b) Procedural Manual for Operations, Maintenance, and Emergencies
192.465 (d) External Corrosion Control: Monitoring
192.467 (a) External Corrosion Control: Electrical Isolation

Summary of the Current Situation

Work has been performed in all CP areas during the past twelve months. The Long Beach system can be considered to be "in compliance" because work has been performed in all CP areas. The Department has been aggressively working to bring the system under cathodic protection and we have been submitting semi-annual reports to you on the status of the work in progress. Since the start of the program in early 2004 we estimated that only 30% of the system was under cathodic protection. Currently we estimate that 87 % of the system is fully under CP.

The changing percentage of areas fully under CP can and will vary constantly because of such issues as electrical shorts grounding the system. Long Beach has 45 CP areas and the table below identifies in broad scope the status associated with the areas. Also, these areas can vary as they are constantly being reevaluated to establish new boundaries associated with the changing conditions. The reason for the drop from June 2008 - 93% coverage in areas meeting the criteria to 87% is associated with pipeline construction isolating the east side of the port area, the installation of four new deep anode beds to cover five areas and 614 electrical shorts have been discovered and 596 cleared by in-house resources.

As required, I have attached to this letter the next revision of the status report. It should be noted that we have been submitting reports to you, starting early 2004, since we voluntarily informed you of the issues.

Sincerely,

Alan Winter
Manager of Engineering and Construction
(562) 570-2040

AW:

Attachment: Corrosion Control - Cathodic Protection Recovery Plan December 2008