

WARNING LETTER

VIA UPS 2-DAY AIR-1Z WR2 578 02 9506 3667

June 14, 2013

Mr. Bill Skinner
City Manager
City of Coalinga
155 West Durian
Coalinga, CA 93210

CPF 5-2013-0010W

Dear Mr. Skinner:

On March 28, 2012, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), pursuant to Chapter 601 of 49 United States Code, inspected your municipal gas distribution system in Coalinga, California.

As a result of the inspection, it appears that you have committed a probable violation of the Pipeline Safety Regulations, Title 49, Code of Federal Regulations. The items inspected and the probable violation is:

1. § 192.383 Excess flow valve installation.

(b) *Installation required.* An excess flow valve (EFV) installation must comply with the performance standards in § 192.381. The operator must install an EFV on any new or replaced service line serving a single-family residence after February 12, 2010, unless one or more of the following conditions is present:

- (1) The service line does not operate at a pressure of 10 psig or greater throughout the year;**
- (2) The operator has prior experience with contaminants in the gas stream that could interfere with the EFV's operation or cause loss of service to a residence;**
- (3) An EFV could interfere with necessary operation or maintenance activities, such as blowing liquids from the line; or**

(4) An EFV meeting performance standards in § 192.381 is not commercially available to the operator.

(c) *Reporting.* Each operator must report the EFV measures detailed in the annual report required by § 191.11.

The City of Coalinga failed to install an excess flow valve (EFV) on all service lines that have been newly installed or replaced after February 12, 2010.

Based on your e-mail correspondence dated June 12, 2013, it is our understanding that the City of Coalinga completed retro-fitting all the service lines that had been installed or replaced after the required date with an approved EFV. A follow-up inspection will be conducting by PHMSA representative to verify this information at your facilities in the near future.

Under 49 United States Code, § 60122, you are subject to a civil penalty not to exceed \$200,000 per violation per day the violation persists up to a maximum of \$2,000,000 for a related series of violations. For violations occurring prior to January 4, 2012, the maximum penalty may not exceed \$100,000 per violation per day, with a maximum penalty not to exceed \$1,000,000 for a related series of violations. We have reviewed the circumstances and supporting documents involved in this case, and have decided not to conduct additional enforcement action or penalty assessment proceedings at this time. We advise you to correct the item(s) identified in this letter. Failure to do so will result in City of Coalinga being subject to additional enforcement action.

No reply to this letter is required. If you choose to reply, in your correspondence please refer to **CPF 5-2013-0010W**. 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).

Sincerely,

Chris Hoidal
Director, Western Region
Pipeline and Hazardous Materials Safety Administration

cc: PHP-60 Compliance Registry
PHP-500 D. Mulligan (#132893)