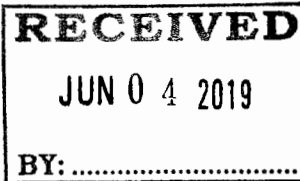


City of Susanville

PUBLIC WORKS DEPARTMENT



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Dan Newton, *Director* • Dan Gibbs, *City Engineer*

May 28, 2019

Dustin Hubbard
Director, Western Region
Pipeline and Hazardous Materials Safety Administration
Office of Pipeline Safety – Western Region
12300 W. Dakota Avenue
Suite 110
Lakewood, Co. 80228

Ref: CPF 5-2019-0015M

Mr. Hubbard:

Below are listed the corrections made to the City of Susanville Natural Gas Operation and Maintenance Plan book as required by Notice of Amendment dated March 18, 2019 reference number CPF 5-2019-0015M.

1. § 192.16 Customer notification.

Susanville's process for customer notification does not meet the requirements of § 192.16(b) because it does not contain the required information listed in § 192.16(b)(1) through (5).

Item 1 Corrections:

O&M SECTION F

3.3 METER SET INSTALLATION

- B. Property line sets are acceptable only when it is most practical for the customer and the Operator. The operator does not maintain the customer's buried piping or other piping downstream of the meter set assembly. Customers should periodically inspect for corrosion and leakage. If unsafe conditions are discovered repairs shall be made. Piping should be located by hand before excavation near buried piping. Operator or qualified contractor can assist in repairs of customers buried piping.

2. § 192.605 Procedural manual for operations, maintenance, and emergencies

The Susanville O&M manual does not contain a process for the abandonment of vaults

pursuant to § 192.727, contained in Subpart M of Part 192, which requires that each abandoned vault be filled with a suitable compacted material. Additionally, the Susanville O&M manual does not contain a process for the inspection of vaults pursuant to § 192.749, also contained in Subpart M of Part 192, which sets forth requirements for vault inspections and maintenance.

Item 2 Corrections:

O&M Section E -7

7.2 ABANDONMENT

- I. Each abandoned vault must be filled with suitable compacted material.

O&M Section O-2

2.4 VAULT MAINTENANCE

- A. Each vault housing pressure regulating equipment and pressure limiting devices with 200 cubic feet or more must be inspected at intervals not to exceeding 15 months and at least once each calendar year.
- B. Inspection is to determine good physical condition and adequately ventilated.
- C. Inspect vault covers insure no hazards are present to public safety.

3. **§ 192.605 Procedural manual for operations, maintenance, and emergencies**
The Susanville O&M manual did not have sufficient procedures for external corrosion control, nor internal corrosion control. Specifically, the Susanville O&M did not meet the requirement of § 192.455(a)(2) External corrosion control: Buried or submerged pipelines installed after July 31, 1971, contained in Subpart I of Part 192. Section L. The O&M did not explicitly require that each buried or submerged pipeline installed after July 31, 1971, have a cathodic protection system designed to protect the pipeline in accordance with Subpart I installed and placed in operation within 1 year after completion of construction.

Additionally, the Susanville O&M did not meet the requirements of § 192.475 Internal corrosion control: General, contained in Subpart I of Part 192. The Susanville O&M manual requires in Section L-2 that internal corrosion inspections "be performed whenever possible, but not less than twice each year" [emphasis added]. Part 192 does not require

Item 3 Corrections:

O&M Sections; L-1

1.4 GENERAL REQUIREMENTS

- J. Each buried or submerged pipeline must be protected against external corrosion, including the following,

1. External coatings shall have external protection as required in 192.461 CFR 49 to protect against damages and adverse conditions.
2. Must have a cathodic protection system designed and installed to protect the pipeline from external corrosion within 1 year of completion of construction of pipeline.

O&M Sections; L-2

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.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dan Newton', with a stylized flourish extending to the right.

Dan Newton, P.E
Public Works Director

cc: Kenneth Bruno
Program Manager
Gas Safety and Reliability Branch
California Public Utilities Commission
Safety and Enforcement Division