

CPF 5-2011-0007M



4305 Santa Fe Avenue, Vernon, California 90058
Telephone (323) 583-8811

November 4, 2010

Mr. Chris Hoidal
Director, Western Region
Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
12300 Dakota Avenue, Suite 110
Lakewood, CO 80228

By Overnight Mail

Re: Management Change and Gas Distribution System Inspection Follow Up

Dear Mr. Hoidal:

The purpose of this letter is to inform you of management changes at City of Vernon, and also to follow up on the recent distribution system inspection.

Regarding Vernon management, please be informed that Donal O'Callaghan is no longer with City of Vernon. Effective September 16, 2010, I am the new Director of Light and Power, and also responsible for operation of Vernon's natural gas system. Accordingly, please direct all future correspondence directly to my attention for expedient distribution and response by City of Vernon. My contact information:

Carlos Fandino
Director of Light and Power
City of Vernon
4305 South Santa Fe Avenue
Vernon, CA 90058

Email: cfandino@ci.vernon.ca.us
Office: (323) 583-8811
Cell: (661) 857-9272

Phillip Nguyen from PHMSA visited Vernon August 16 through 19, 2010, and again this week on November 3, 2010. The following is a list of action items completed during and following his visits that should fulfill his various requests. Items 1 - 11 relate to

Exclusively Industrial

Vernon's Operations and Maintenance plan, item 12 to the Emergency Response Plan, and item 13 to an ASTM standard for PE electrofusion pipe fittings.

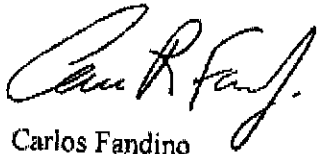
1. Stated pipeline lengths. The stated pipeline length for the transmission system has been corrected to state 35,904 feet, and the length for the distribution system corrected to state a length of approximately 44 miles. (Page 2)
2. Correction to Recurring Event Schedule. The specified requirement for rectifier and cathodic testing once a year was stated twice in the table and therefore redundant. One of the two event reminders was removed. (Page 3)
3. Butt fusion procedure. A reference has been inserted in the section "Joining Plastic Pipe: Joining Procedures Qualification," stating that a more detailed explanation of Butt Fusion can be found in "Operation, Maintenance and Installation Procedures," on page C2. (Page 7)
4. Public Awareness Program. The reference to CFR 192.616 has been corrected. (Page 14)
5. Incident reporting by telephone. The correct phone number has been added for the National Response Center in Washington D.C. The section has been rewritten for better clarity. (Page 15)
6. Incident reporting: Written. This section now specifies forms for transmission and forms for distribution, and that submittal can be electronic via the stated web site. (Page 15)
7. Incident reporting: Supplemental written. This section clarifies that supplemental information shall be submitted in the event of new or different findings following the initial report. (Page 15)
8. Safety-Related Condition Report. The address has been corrected for submittal of a Safety-Related Condition Report. This section has been rewritten for better clarity. (Page 15-16)
9. Testing of gas odorant. Because SoCalGas will not release verification to us that Vernon's gas is properly odorized, Vernon is purchasing an odorant testing device and will document periodic testing of odorant in the gas as required by PHMSA. (Page 16-17)
10. Underground Damage Prevention. Section 4, Damage Prevention Program has been added stating that City of Vernon uses Underground Service Alert of Southern California (www.digalert.org) and follows up on requests in a timely manner. (Page 20)
11. Operations, Maintenance, and Installation PROCEDURES. The procedures appendix of the O&M plan is now in the same folder, rather than contained as a separate document.
12. Emergency Response Plan. Valve identification numbers have been corrected for Valves "S-W1" and "S-W2." (Page III-18)
13. ASTM Designation F1055 - 98: Standard Specification for Electrofusion Type Polyethylene Fittings. On Mr. Nguyen's November 3, 2010, visit, we confirmed Vernon's electrofusion fittings meet this standard by observing the standards shown on fittings in inventory.

This completes the list of items.

Please feel free to contact me if you have questions. Your staff may also continue to contact Dan Bergmann of IGService, whom supports our natural gas operation. Mr. Bergmann can be reached at 925-899-2578 (cell) or dan@igservice.com.

We appreciate Mr. Nguyen's patient attention to detail during his visits to Vernon. Our objective is to operate our gas system safely. The recurring inspections help us do so.

Sincerely,



Carlos Fandino
Director of Light and Power

db:db

cc: Document Control
Dan Bergmann
Dan Lopez

By email: Phillip Nguyen at phillip.nguyen@dot.gov