

**CALIFORNIA PUBLIC UTILITIES COMMISSION
Safety and Enforcement Division
Gas Safety and Reliability Branch
Gas Engineering and Compliance Section**

Incident Investigation Report

Report Date: 07/30/2020

Incident Number: G 20200508-3045

Utility: Southern California Gas SoCalGas

Date and Time of the Incident: 5/8/2020, 10:53:00 AM

Location of the Incident: [REDACTED]

West Hollywood ,CA

County: Los Angeles

Summary of Incident:

On May 8, 2020, at approximately 2253 hours, Underground Solution, a subcontractor working for HP Communications Inc., (a third-party contractor) was performing directional drilling to install a conduit for MCI Communications when the boring tool damaged a SoCalGas 6-inch steel gas main resulting in an unintentional release of natural gas into the atmosphere. There were no fatalities, injuries, or interruption of service to SoCalGas' customers reported as the resulted of this incident. Based on the investigation, SED found that Underground Solution did not have a valid USA ticket at the time of the incident. In addition, SED found SoCalGas in violation of General Order 112-F, Title 49 of Code of Federal Regulation, §192.614(c)(5) for not locating and marking the 6-inch steel gas main. Furthermore, SED found SoCalGas in violation of §192.605(a) for not following Gas Standard 184.0200, Section 7.14.

Casualties: *Fatalities:* 0 *Injuries:* 0

Property Damage: \$57,045.00

Utility Facilities involved:

Pipe Material = Steel, Pipe Size = 6 (inches), MAOP = 40 (psi), Operating Pressure = 35 (psi)

Witnesses:

<i>Name</i>	<i>Title</i>	<i>Phone</i>
1 Mahmoud Intably	CPUC Investigator	N/A
2 Ali Matin	SoCalGas - PSCA	(909) 919-0463
3 [REDACTED]	HP Communication Inc	[REDACTED]
4 [REDACTED]	Underground Solution	[REDACTED]
5 Michael Gallardo	SoCalGas - ETD	(909) 919-0463
6 Desmond Lew	SED - SU Engineer (Specialist)	(213) 576-7020

Evidence:

<i>Source</i>	<i>Description</i>
1 SoCalGas	Initial Report
2 SoCalGas	Final Report
3 SED	Data requests to SoCalGas
4 SoCalGas	Response to SED data requests
5 DigAlert	Response to SED data request

Observations and Findings:

On May 8, 2020, at approximately 2253 hours, Underground Solution, a subcontractor working for HP Communications Inc., (a third-party contractor) was performing directional drilling to install a conduit for MCI Communications at the intersection of Santa Monica Blvd and Croft Ave in West Hollywood when the boring tool damaged a SoCalGas 6-inch steel gas main resulting in an unintentional release of natural gas into the atmosphere. Local emergency response units responded and blocked off the area and rerouted the traffic. There were no fatalities or injuries reported as a result of this incident. This incident was reported to both the Department of Transportation (DOT) and the CPUC due to gas release and potential cost of repairs exceeding \$50,000. In addition, there was no service interruption to SoCalGas' customers as a result of this incident.

SoCalGas' crews arrived on the scene at approximately 2319 hours, coordinated with the local emergency response units, excavated two remote control holes to install pressure control fittings to stop the flow of gas, and at approximately 2325

hours the crews terminated gas flow. SoCalGas' crews excavated and exposed the damaged section of the 6-inch steel gas main and found a 0.250-inch hole. The crews followed SoCalGas' Gas Standards to purge the gas main of gas and to make permanent repairs to the damaged section by welding a steel band over the 0.250-inch hole. The 6-inch steel gas main was back in service on May 9, 2020 at approximately 0200 hours.

After the repair was completed, SoCalGas' crews performed a post-incident leak survey and found no gas indications.

On May 9, 2020, SED staff arrived on the scene at approximately 0800 hours and met with Ali Matin, SoCalGas' representative. SED staff took photos of the intersection and the delineated area including the temporary markings of water, communication, and electric underground facilities. While at the incident site SED staff did not observe any markings of SoCalGas' 6-inch steel gas main in the delineated area where the incident occurred.

The estimated cost to repair the damage was \$3,000, emergency response \$53,900, and gas released \$145.

According to SoCalGas' records, the 6-inch seamless steel main was located in a Class 3 Location, installed in 1983, depth of cover of 45 inches, 0.188 wall thickness, and MAOP of 40 psig, and MOP of 35 psig.

On May 9, 2020, at approximately 1000 hours, SED interviewed [REDACTED], HP Communications Inc., over the telephone. Mr. [REDACTED] stated that the project was subcontracted to Underground Solution to install a conduit for MCI Communications in the intersection of Santa Monica Blvd and Croft Ave and up to Edison's pole number 917507E. Mr. [REDACTED] provided a set of photos of the accident site including marking of other underground facilities. In addition, Mr. [REDACTED] stated that HP Communications Inc. had a valid USA ticket number A201040862 issued on 4/15/2020 and the area was delineated with white paint.

On May 9, 2020, at approximately 1120 hours, SED interviewed [REDACTED] over the telephone. Mr. [REDACTED], Underground Solution had a valid USA ticket (using HP Communications Inc.). In addition, he stated that on May 7, 2020, he walked the intersection and did not find any marking for SoCalGas' underground facilities. He contacted the SoCalGas' ETD (MSGALLAR) and he informed him that it is good to go "No Gas facilities"

On May 11, 2020, SED sent an email to DigAlert and requested copies of any USA ticket(s) requested by Underground Solution. On May 12, 2020, SED received an email indicating that there was no USA ticket request submitted by Underground Solution associated with the site where the incident occurred.

On May 20, 2020, at approximately 1300 hours, SED interviewed Michael Gallardo, SoCalGas Energy Technician Distribution (ETD) over the telephone. Mr. Gallardo

stated that he contacted Mr. [REDACTED] and obtained a new mutually agreed due date April 28, 2020, to locate and mark SoCalGas' facilities and complete the USA ticket. Mr. Gallardo called in sick on April 20 and returned to work on April 29, 2020. Upon his return, he was overwhelmed with his backlog of USA tickets and did not follow-up with Mr. [REDACTED].

According to SoCalGas' management, the ETD was responsible for completing the USA tickets in a timely manner and was authorized by management to work overtime and /or instructed to get new mutually agreed due date for the tickets that ETD cannot complete on time. ETD was required to report to his supervisor any missing or late USA tickets. Based on his supervisor, [REDACTED], Mr. Gallardo did not report any missed tickets. In addition, in case the employee called in sick, his assigned laptop (with the tickets) will be assigned to another ETD to review the tickets, to complete the USA tickets, and to communicate with his supervisor if any of the tickets cannot be completed by their due date.

1 California Government Code 4216, Section 4216.2(b) states:

"Except in an emergency, an excavator planning to conduct an excavation shall notify the appropriate regional notification center of the excavator's intent to excavate at least two working days, and not more than 14 calendar days, before beginning that excavation. The date of the notification shall not count as part of the two-working-day notice. If an excavator gives less notice than the legal excavation start date and time and the excavation is not an emergency, the regional notification center will take the information and provide a ticket, but an operator has until the legal excavation start date and time to respond. However, an excavator and an operator may mutually agree to a different notice and start date. The contact information for operators notified shall be available to the excavator."

SED found that Underground Solution failed to call 811 and notify DigAlert at least two working days before starting the excavation.

2 General Order (GO) 112-F, Title 49 of Code of Federal Regulation (CFR), Part 192, §192.614 Damage Prevention Program, §192.614 (c)(5) states:

"Provide for temporary marking of buried pipelines in the area of excavation activity before, as far as practical, the activity begins."

SED found that SoCalGas' ETD failed to locate and mark SoCalGas' 6-inch steel gas main in the area of excavation activity. Therefore, SED finds SoCalGas in violation of §192.614 (c)(5) for not locating and marking the 6-inch steel gas main.

3 General Order (GO) 112-F, Title 49 of Code of Federal Regulation (CFR), Part 192, §192.605 Procedural manual for operations, maintenance, and emergencies, §192.605 (a) states:

“General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least one each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.”

SoCalGas Gas Standard 184.0200 Underground Service Alert and Temporary Marking, Section 7.14 states:

“Schedule follow-up calls where additional excavator contact or marking is necessary. Any USA ticket that requires multiple visits to complete the locating and field markings can be made a project ticket in KorTerra®. If the excavation activity shall continue for an extended period of time and job observations are desired, then the ticket may be made a project in KorTerra®. However, USA tickets shall not be made a project in KorTerra® if there are access or marking issues, or excavation work will not continue for a long period of time. Instead of using the project indicator to keep tickets open, the locator shall partially complete the ticket in KorTerra®, if the ticket has not been located and marked, such as when mutual agreements are made to provide locate and mark at a later date and time. See mutual agreement requirements”

According to SoCalGas’ management, the excavation area was easily accessible, the USA ticket did not require multiple visits, and Mr. Gallardo had no reason to postpone the locate and mark the 6-inch steel gas main. In addition, the USA ticket did not require follow-up calls where additional excavator contact or marking is necessary for Mr. Gallardo to put the USA ticket in MDT under “project” status. Mr. Gallardo’s action resulted in the MDT showing that as an ongoing project it was addressed by Gallardo. Furthermore, SoCalGas’ management stated that the newly assigned ETD was only focusing on the USA tickets that were due for that day when he was assigned Mr. Gallardo’s MDT on April 20, 2020. Therefore, SED finds SoCalGas in violation of §192.605 (a) for not following Gas Standard 184.0200, Section 7.14.

SED reviewed SoCalGas’ Gas Standards, records, interviewed witnesses and found that the process addressing the USA tickets contained enormous gaps / flaws. Whether this is simply a coincidence or part of a larger systematic issue, it raises a major safety concern and a lack of oversight that requires serious examination. SED recommends SoCalGas review its damage prevention program, identify the deficiencies, and take a proactive role in implementing corrective actions.

Preliminary Statement of Pertinent General Order, Public Utilities Code

Requirements, and/or Federal Requirements:

<i>General Order</i>	<i>GO Rule</i>
1 GO112F	Title 49 CFR, Part 192, Section 192.614(c)(5)
2	CGC 4216, Section 4216(b)
3 GO112F	Title 49 CFR, Part 192, Section 192.605(a).

Conclusion:

Based on the investigation, SED found that Underground Solution did not have a valid USA ticket at the time of the incident. In addition, SED found SoCalGas in violation of General Order 112-F, Title 49 of Code of Federal Regulation, §192.614(c)(5) for not locating and marking the 6-inch steel gas main. Furthermore, SED found SoCalGas in violation of §192.605(a) for not following Gas Standard 184.0200, Section 7.15.

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