



GILL RANCH STORAGE

220 NW 2nd Avenue, Portland, OR 97209

March 1, 2017

Kenneth Bruno
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

RE: Gill Ranch Storage, LLC Response: Safety and Enforcement Division
Inspection of Emergency Management Program

Dear Mr. Bruno:

Gill Ranch Storage, LLC (“GRS”) operates the Gill Ranch Storage Facility (“Gill Ranch”). GRS is committed to a culture and operations that value public and worker safety as a first priority. GRS appreciated the opportunity to demonstrate its commitment to safe and reliable operations during the recent Safety and Enforcement Division (“SED”) General Order (“GO”) 112 inspection of GRS’ emergency management program.

GRS has carefully reviewed the SED’s GO 112 Summary of Inspection Findings and responds to the individual findings as follows:

A. Probable Violations

1. Title 49 CFR §192.605 Procedural manual for operations, maintenance, and emergencies states in part:

“(a) 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 once 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.”

SED reviewed emergency response procedures including the Emergency Action Plan (Revision 1.1 October 10, 2010) available to controllers during emergencies. Emergency response procedures were updated and reviewed by the operator at intervals not exceeding 15 months; however, the Emergency Action Plan was last updated and reviewed in 2011.

GRS is therefore in violation of Title 49 CFR §192.605 for failing to review its Emergency Action Plan at intervals not exceeding 15 months.

Response:

GRS, as advised by Alin Podoreanu, and as part of its post-SED inspection activities has reviewed both the Emergency Response Plan and Emergency Action Plan. Based on the results of this review the Emergency Action Plan and Emergency Response Plan were combined with the organizational structure of the revised plan following that of the Emergency Action Plan as suggested by Mr. Alin Podoreanu. GRS believes that these actions eliminate redundancy and potential confusion while strengthening its emergency response preparedness efforts.

On-duty personnel have been trained in the use of the revised plan. Personnel that are off (and not yet trained) will be trained prior to their beginning any work activities.

GRS shall conduct an annual review at least once each calendar year (not to exceed 15 months) of the Emergency Action Plan.

2. Title 49 CFR §192.615 Emergency Plans states in part:

“(2) Train the appropriate operating personnel to assure that they are knowledgeable of the emergency procedures and verify that the training is effective.”

GRS explained it trains personnel on emergency response topics annually and uses written questions to verify knowledge. GRS currently does not have minimum passing criteria for these trainings and could not demonstrate how it verifies that training is effective.

GRS is therefore in violation of Title 49 CFR §192.615 for failing to demonstrate that its training is effective.

Response:

GRS believes that it has complied with the requirement to demonstrate the training effectiveness through its tabletop exercises and a review of the written training questions covered throughout the year. Any deficiencies or additional training needs would have been identified during the exercise.

Notwithstanding this, GRS has updated its Emergency Response training requirements to require a pass rate of 100% on all written evaluations. Personnel who do not have a 100% pass score will be provided two additional opportunities to retake those questions that they missed. The first test retake of the missed questions may occur on the employee's next shift or next calendar day. Personnel will be allowed a third attempt to retake missed questions on employee's next shift or next calendar day.

Personnel who do not have a 100% pass score after the third attempt will have to be completely retrained and re-tested in the GRS Emergency Response Procedures.

3. Title 49 CFR §192.615 Emergency Plans states in part:

“(c) Each operator shall establish and maintain liaison with appropriate fire, police, and other public officials to:

- (1) Learn the responsibility and resources of each government organization that may respond to a gas pipeline emergency;*
- (2) Acquaint the officials with the operator's ability in responding to a gas pipeline emergency;*
- (3) Identify the types of gas pipeline emergencies of which the operator notifies the officials; and*
- (4) Plan how the operator and officials can engage in mutual assistance to minimize hazards to life or property.”*

SED reviewed GRS's liaison records with public officials. The records reviewed by SED do not indicate content information about the meetings. GRS is in violation of §192.615 for failing to demonstrate it met the requirements of Title 49 CFR §192.615 (c) (1) through (4).

Response:

GRS does liaison with appropriate fire, police, and other public officials. GRS maintains liaison records, however, we recognize that we can improve in our documentation of liaison activities. As a result of the audit, GRS has implemented the following process regarding the documentation of future liaison activities.

Emergency Agency liaison activities (meetings, calls, correspondence, planning and preparedness activities) shall be documented. Documentation shall include (as appropriate):

1. Contact information: name(s), titles or responsibilities, phone, email, and mailing address. Where appropriate, emergency contact information will also be requested and documented as it is provided.

2. The responsibility and resources of each government organization that may respond to a gas pipeline emergency;
3. The information communicated and provided to acquaint officials with the operator's ability in responding to a gas pipeline emergency;
4. The types of gas pipeline emergencies of which GRS would notify Emergency Response Agencies/officials;
5. A summary of discussions associated with identifying how GRS and emergency response agencies/officials can work together to minimize hazards to life or property and resulting coordination of planning and preparedness activities;
6. A summary of planning/preparedness activities;
7. A record of information provided (*e.g.* maps, emergency response information/program, etc.).

B. Areas of Concern and Recommendations

1. SED reviewed documentation for liaison activities. Some of the attendance rosters for liaison meetings did not list an organization and contact information for participants. SED recommends GRS document the organization and contact information on the attendance rosters to help identify who represented the organizations and have contact information for future support readily available.

Response:

GRS will make every effort to document attendees to its liaison meetings. This information will include the attendee, the organization they are representing and their contact information. Our statement of every effort is to recognize that there are some events at which an individual may refuse to provide the information, or somehow makes it past the sign-in table, without signing in.

2. SED recommend GRS have multiple hard copies of the emergency response manuals available to personnel to provide support to multiple employees concurrently.

Response:

GRS will maintain 3 complete plans at the compression facility. Company vehicles shall also have a copy of the Emergency Response Plan.

3. GRS public awareness materials reference DigAlert as the 811 regional notification center. DigAlert is Southern California's regional notification center for Imperial, Inyo, Los Angeles, Orange, San Bernardino, San Diego, Santa Barbara and Ventura counties. SED recommends GRS reference USA North as the 811 regional notification center for Madera and Fresno counties.

Response:

GRS fixed this typographical error during the audit. The plan now references USA North as the 811 regional notification center for Madera and Fresno counties.

4. Since there are multiple 911 dispatch centers in GRS's right-of-way who may not be aware of GRS and its facilities, SED recommends GRS contact 911 dispatch centers in their service territory and verify dispatch centers have emergency contact information for GRS and are aware of the pipeline right-of-way.

Response:

GRS has contacted the 911 dispatch centers that would receive calls and has communicated and provided the following information:

1. Introduction/re-introduction of Gill Ranch with a pipeline system description (including the pipeline route right-of-way, interconnect stations, valve stations, compressor station), possible types of emergencies GRS may experience, summary of on-site chemicals, and confirmation that GRS will notify the National Response Center, PHMSA and the CPUC as required by each agency in the event of an emergency.
 2. How to contact Gill Ranch Storage in the event of receiving a 911 call. This includes weekday, nights, weekends and holidays.
 3. GRS also discussed with the 911 call centers their capabilities in contacting the railroad adjacent to Jack's Landing. GRS as a matter of emergency response policy shall request (as needed) that the call center notify the railroad.
5. SED reviewed GRS emergency response procedures and the Emergency Action Plan submitted to the CPUC as part of the initial application Nos. A.08-07-032/A.08-07-033. Since the Emergency Action Plan contains excellent general emergency response guidance and procedures to help meet code requirements, SED recommends that GRS makes the information contained in the plan available to GRS personnel in the future whether as a standalone document or incorporated into GRS emergency response procedures.

Response:

GRS, upon the advice of Alin Podoreanu, has reviewed both the Emergency Response Plan and Emergency Action Plan. As a result of this review and upon the advice of Alin Podoreanu, the Emergency Action Plan and Emergency Response Plan were combined. The organizational structure of the revised plan follows that of the Emergency Action Plan as suggested by Mr. Podoreanu. GRS believes that these actions eliminate redundancy and potential confusion while strengthening its emergency response preparedness efforts.

On-duty personnel have been trained in the use of the revised plan. Personnel that are off (and not yet trained) will be trained prior to their beginning any work activities.

GRS shall conduct an annual review at least once each calendar year (not to exceed 15 months) of the Emergency Action Plan.

We appreciate the opportunity to provide these responses, and we look forward to working with SED over the years to come. Please contact me if you have any questions about this response or require additional information.

Sincerely,



David A. Weber
President and CEO

cc: Richard Gonzalez, Plant Superintendent
Todd Thomas, Project Manager, NW Natural Gas Storage
Roger M. Haley, Principal Engineer, GRS
Karl J. Leger, President, RegSafe, LLC