



GILL RANCH STORAGE®

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VIA U.S. & ELECTRONIC MAIL [DENNIS.LEE@CPUC.CA.GOV]

Dennis Lee
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

RE: General Order 112-F Gas Inspection of Gill Ranch Storage

Dear Mr. Lee:

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 actively and aggressively pursue safe and reliable operations during the 2019 four-day Safety and Enforcement Division (“SED”) General Order 112-F Gas Inspection covering Emergency Response, Public Awareness, Operator Qualification, and Drug and Alcohol Programs.

GRS has carefully reviewed the SED’s General Order 112-F Gas Inspection Summary of Inspection Findings and has addressed each of the concerns listed by the SED below.

GRS takes safety very seriously and continuously seeks to improve its practices. GRS appreciates SED’s input on our Pipeline Safety programs, and we look forward to working with the 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 & CEO

I. Concerns

Emergency Preparedness and Response: Emergency Response (EP.ERG)

Issue Summary: Based upon conversations with the operator, it appears that employee activities would be reviewed as part of their post-emergency investigations. Section 3.2.2.6.5 Incident Investigation/Root Cause Analysis of the GRS plan does make general statements that would cover this part of the investigation. However, it does not specifically require that employee activities be reviewed to ensure that they were not a root cause of the incident. SED recommends that GRS add this language to their plan to ensure they cover 192.615(b)(3).

GRS Response: GRS has added the following language to Section 3.2.2.6.5 of its Emergency Response Plan to ensure that the post incident investigation includes steps to determine whether or not employee actions were performed in accordance with the GRS emergency response procedures.

Section 3.2.2.6.5 Incident Investigation/Root Cause Analysis (page 3-50, last bullet):

“Determination of whether employee actions were performed in accordance with the emergency response procedures.”

Issue Summary: GRS references to the procedural requirements for liaison with first responders in two places: Section 7.4.2.2 of the Public Awareness Plan and Section 3.2.1.7 of the Emergency Response Plan. Section 7.4.2.2 of the Public Awareness Plan discusses the code requirements and objectives when meeting with first responders and Section 3.2.1.7 of the Emergency Response Plan describes the main methods GRS uses to communicate those requirements, which are emergency exercises. SED recommends that GRS add a reference in each of those sections to the other, thus ensuring that GRS process of liaison is fully described.

GRS Response: GRS has reviewed the language in both of the sections mentioned in the Issue Summary and added cross references to each section so that the full process of GRS liaison with emergency responders is described.

Section 7.4.2.2 Liaison with Emergency Responders (page 7-19)

“See Section 3.2.1.7 of the Emergency Response Plan for methods in which communication with emergency responders is performed.”

Section 3.2.1.7 Training, Exercises, Drills and Incident Documentation (page 3-38)

“See Section 7.4.2.2 of the Public Awareness Plan for specific requirements related to maintaining liaison with Emergency Responders.”

Issue Summary: GRS uses a third-party contractor for PAP liaisons with first responders who distributes copies of their ERP as well as invites them to emergency exercises. First responder attendance at GRS exercises has been very good. GRS was able to relate to SED what site specific emergency response information that they provide to their first responders as well as what level of participation they typically get from them during the emergency exercises. GRS also showed SED “911 Emergency Quick Reference Card” document that they distributed during the March 2018 emergency exercises and that they gave a facility tour in March 2019. However, GRS was not able to show specific documentation all of this

information to SED. SED recommends that GRS especially document the site-specific emergency information that it provides to first responders. GRS should also document how they interact with first responders during emergency exercises and any feedback they have, if any, in order to demonstrate compliance with their procedures in the PAP Section 7.4.2.2.

In addition, in the past GRS has had representatives from PG&E at their emergency exercises but they are not sure who invites them. SED recommends that GRS invite both the pipeline and electric side of PG&E to their exercises and document the invitation.

GRS Response: GRS is planning to host its next Pipeline Emergency Response Exercise in the spring of 2020. During this exercise all information given to emergency responders will be documented (including site specific emergency information). The interaction with first responders during the exercise will also be documented in the post exercise report. Feedback has been documented in the past through a post exercise survey given to all participants that asks questions regarding the particular scenario, as well as comments/concerns that each participant thinks would improve future exercises. This will continue to be documented. Representatives from PG&E (pipeline and electric) will also be invited to the drill, and all attendees will be documented via sign in sheet as usual. Section 3.2.1.7 of the Emergency Response Plan outlines who will be invited to participate in the exercises:

Section 3.2.1.7 Training, Exercises, Drills and Incident Documentation (last paragraph, 4th sentence)

“Gill Ranch will share the training and drill schedule with local emergency response entities and other utility providers and encourage their participation as an opportunity to reinforce incident response preparedness by working through a scenario, assessing the effectiveness of Gill Ranch processes and procedures and gain experience in the plan execution.

Public Awareness and Damage Prevention: Public Awareness (PD.PA)

Issue Summary: Gill Ranch Storage’s Public Awareness Damage Prevention Program does not list a frequency for conducting effectiveness evaluations. A deadline for the initial effectiveness evaluation is listed, however, the frequency of subsequent evaluations are not specified. Gill Ranch should include a frequency requirement of “no more than 4 years apart” to reflect the requirements of API RP 1162 Section 8.5.

GRS Response: GRS updated the language in its Public Awareness Plan to reflect the requirements of API 1162 Section 8.5. GRS has performed its effectiveness evaluations (initial and subsequent) no more than four years apart; however, the program language wasn’t specific in regard to subsequent evaluations.

Section 7.2.2 Continuous Improvement (page 7-7, 3rd bullet)

“Periodically evaluate and determine if program changes are needed based on the lessons learned from the program’s implementation and management. The program will be reviewed for effectiveness within four years of the date the operator’s program was first completed and subsequent evaluations shall be no more than four years apart.”

Training and Qualification: Qualification of Personnel – Specific Requirements (IM) (TQ.QUIM)

Issue Summary: There is no documentation or verification of the TIMP Management Teams' qualifications. SED suggests adding a record of verification of qualifications during their TIMP annual review and adding this process in the IM plan.

GRS Response: GRS has established minimum qualification criteria for each of the TIMP Management Team members as seen in the TIMP Team Responsibilities and Qualifications table. Section 13.5 of the GRS Integrity Management Program states "Selection of an individual to TIMP Management Team is an acknowledgment by GRS Senior Management that the individual satisfies the required qualifications. GRS believes that by maintaining the list of TIMP team members and their minimum qualifications, the qualifications of each team member are being verified. To better document this verification, GRS will add a step to its annual TIMP Team meeting worksheet that covers verification of TIMP Management Team qualifications.

Training and Qualification: Training of Personnel (TQ.TR)

Issue Summary: Emergency response training is handled through annual emergency exercises as well as rotating monthly training. One of the months involves a training of the ERP. However, ERP Section 3.2.1.7 only mentions the emergency exercise training. SED recommends that GRS add the monthly training requirements to the ERP as well as the 100% passing requirement mentioned in the response to the CPUC's previous audit of the Emergency Response Program in 2016.

GRS Response: GRS has added the following language to Section 3.2.1.7 of the Emergency Response Plan:

Section 3.2.1.7 Training, Exercises, Drills and Incident Documentation (page 3-38 second paragraph)

"Emergency Response Plan training is conducted at least once each calendar year (classroom training). This training is intended to review the GRS emergency response procedures as well as the incident command system. In conjunction with the classroom training, each trainee is given a written test, and must pass with a score of 100%. Anyone who does not pass with 100% will be allowed to review the training material and retake the test the next day. If he/she does not pass with a score of 100% on the second attempt, the GRS Safety Representative will retrain them in a face to face session on the portions of the emergency response procedures he/she is not understanding. The test can be taken a third time after this remedial training is complete."