

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



October 24, 2019

Mr. David A. Weber, President and CEO
Gill Ranch Storage
220 NW 2nd Avenue
Portland, OR 97209

GI-2019-09-GRS-38

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

Dear Mr. Weber:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order 112-F inspection of Gill Ranch Gas Storage (Gill Ranch) on September 30 – October 3, 2019. The inspection included a review of the Emergency Response Plan (ERP), the Operator Qualification Program (OQ), the Public Awareness Program (PAP), and the Anti-Drug & Alcohol Misuse Prevention Plan (D&A).

SED's findings are noted in the Attached Post-Inspection Written Preliminary Findings (Summary) section of this letter. The Summary reflects only those particular records and pipeline facilities that SED inspected during the inspection.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by Gill Ranch to address the concerns noted in the Summary.

If you have any questions, please contact Joel Tran at (415) 515-3442 or by email at Joel.Tran@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Dennis Lee".

Dennis Lee, P.E.
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Post-Inspection Written Preliminary Findings

cc: Todd Thomas, GRS
Claudia Almengor, SED

Post-Inspection Written Preliminary Findings

Dates of Inspection: 9/30/2019 – 10/3/2019

Operator: GILL RANCH STORAGE LLC

Operator ID: 32549 (primary)

Inspection Systems: Gill Ranch Storage

Assets (Unit IDs): Gill Ranch Storage

System Type: GT

Inspection Name: Gill Ranch Emergency, PAP, OQ, D&A

Lead Inspector: Joel Tran

Operator Representative: Karl Leger

Unsatisfactory Results

No Preliminary Findings.

Concerns

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

Question Text Does the process include detailed steps for reviewing employee activities to determine whether the procedures were effectively followed in each emergency?

References 192.615(b)(3)

Assets Covered Gill Ranch Storage (Gill Ranch)

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).

Question Text Does the process include steps for establishing and maintaining liaison with appropriate fire, police and other public officials and utility owners?

References 192.615(c) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03)

Assets Covered Gill Ranch Storage (Gill Ranch)

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 one of 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.

Question Text Do records indicate that liaison has been established and maintained with appropriate fire, police, public officials, and utility owners?

References 192.605(a) (192.615(c)(1), 192.615(c)(2), 192.615(c)(3), 192.615(c)(4), 192.616(c), ADB-05-03)

Assets Covered Gill Ranch Storage (Gill Ranch)

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.

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

Question Text Does the program include a process that specifies how program implementation and effectiveness will be periodically evaluated?

References 192.616(i) (192.616(c), API RP 1162 Section 8, API RP 1162 Appendix E)

Assets Covered Gill Ranch Storage (Gill Ranch)

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.

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

Question Text Do records indicate adequate qualification of integrity management personnel?

References 192.947(e) (192.915(a), 192.915(b), 192.915(c), 192.935(b)(1)(i), 192.947(d))

Assets Covered Gill Ranch Storage (Gill Ranch)

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.

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

Question Text Does the process require a continuing training program to be in place to effectively instruct emergency response personnel?

References 192.615(b)(2) (192.805(b))

Assets Covered Gill Ranch Storage (Gill Ranch)

Issue Summary Emergency response training is handled through annual emergency exercises as well as a 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 requirement to the ERP as well as the 100% passing requirement mentioned in the response to CPUC's previous audit of the Emergency Response Program in 2016.