

2020 Stockton SED Inspection Responses

#	Finding Type	Topic	Code Reference	SED Finding	PG&E Response	Associated Attachment (File Name)
1	Unsatisfactory Results	Operations And Maintenance (PRR.OM)	192.603(b) 192.723(a) 192.723(b)	<p>Issue summary: Title 49 CFR §192.605(a) states, "Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response."</p> <p>PG&E's Utility Standard TD-4110P-09 (rev. 4) Section 9.2 lists "Action to take for Grade 3 leaks: 1. Recheck at 15 months to the date or during the next scheduled survey, whichever comes first." During records review of PG&E's leak recheck records, SED noted Leak Number 11919874 was reported as a Grade 3 Leak on 8/30/2016 and a recheck was conducted on 12/6/2017, exceeding 15 months to the date.</p> <p>PG&E failed to follow their Utility Standard TD-4110P-09 and violated Title 49 CFR §192.605(a).</p>	<p>PG&E recognizes this finding and has taken the following actions:</p> <p>In an effort to prevent recurrence, the PG&E Leak Survey group is utilizing the DC Inspect App which loads rechecks directly into Inspect, avoiding the physical printing of paper rechecks, greatly reducing the risk of missing rechecks. In addition, the Leak Survey group now performs weekly Monday Leak Survey Tier calls where leaks are reviewed from the Recheck Report that are coming due.</p> <p>In addition, Leak Number 11919874 was repaired on 1/11/2018 on Order 42785196.</p>	
2	Unsatisfactory Results	Operations And Maintenance (PRR.OM)	192.709(c) 192.739(a) 192.739(b)	<p>Issue summary: Title 49 CFR §192.603(b) states, "Each operator shall keep records necessary to administer the procedures established under §192.605."</p> <p>PG&E's Utility Standard TD-4540P-01 (rev. 1b, eff. 01/01/16) Section 2.2.4e requires operator personnel to "record differential pressure reading on maintenance record" form. Section 2.9.4 of the same utility standard requires operator personnel to "record all 'as-left' equipment settings on maintenance record" form. During review of regulator maintenance records SED found that PG&E failed to record the 'as-found' and 'as-left' filter differential settings of District Regulator Station LOHP-04 on 1/27/17.</p> <p>PG&E Utility Standard TD-4540P-01 (rev. 1d, eff. 01/01/19) Section 6.1.2 requires operator personnel to "fill in all fields on maintenance record" form. During review of regulator maintenance records SED found that PG&E failed to fill in all required fields on the maintenance record form for work performed at District Regulator Station TYHP-64 on 4/22/19.</p> <p>PG&E failed to keep records as necessary to administer Utility Standard TD-4540P-01 and violated Title 49 CFR §192.603(b).</p>	<p>PG&E recognizes this finding and has taken the following preventative actions:</p> <p>On 7/30/2020 the GPOM Supervisor performed a tailboard refresher for TD-4540P-01 "Maintenance of Regulator Stations" with the crew emphasizing the importance of complete and thorough documentation of maintenance activities. Please see attachment "Stockton GPOM 4540P-01 Tailboard.pdf".</p>	Stockton GPOM 4540P-01 Tailboard.pdf
1	Concerns	Pipeline Inspection (Field) (FR.FIELDPIPE)	192.465(a) 192.463(b) 192.463(c) 192.463(a)	<p>Issue summary: PG&E Utility Standard TD-4181S Section 7.4.3 requires a drivable anode to be installed if readings are less negative than -900mV. PG&E Utility Standard TD-4181P-201 Section 3.1.1 classifies a reading of less negative than -950mV to be considered "Low P/S potential readings".</p> <p>During field observation, SED noted the following read points to be low:</p> <p>10%ers 600 Grattan Ave: -866 mV 342 Best Rd: -790 mV 2404 Coelho Rd: -828 mV 3330 Anne St: -885 mV</p> <p>ETS 3847 N Sutter St: -844 mV 2422 Harding: -732 mV 2410 E 9th St: -828 mV 2317 Yosemite: -506 mV 3036 Sonoma Ave: -788 mV Pole across 125 W Vernalis Rd: -846 mV 2714 Florence Ave: -477 mV 27715 Banta: -746 mV 260 4th St: -709 mV</p> <p>SED requests that PG&E report any corrective actions taken to remediate the listed low pipe-to-soil potential readings and</p>	<p>PG&E recognizes this concern and has taken the following actions:</p> <p>A corrective notification was created for each of the low pipe-to-soil potential readings found. Please see attached spreadsheet "Stockton CP Correctives-2020.xlsx" for the restoration data or remediation status of each location.</p>	Stockton CP Correctives-2020.xlsx