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July 12<sup>th</sup>, 2017

Mr. Ken Bruno  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission  
320 W. Fourth Street, Suite 500  
Los Angeles, CA 90013

Dear Mr. Bruno:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112 Inspection of Southern California Gas Company's (SCG) in the Coastal Transmission Area from May 1 - 5, 2017. The inspection included a review of inspection Unit's Patrolling, Leakage Survey and Odorant records for calendar years 2013 through 2016 and field inspections of pipeline facilities in the Goleta and Ventura Transmission. SED staff also reviewed the Inspection Unit's Operator Qualification records, which included field observation of randomly selected individuals performing covered tasks.

SED staff identified one probable violation and two areas of concern. Attached are SoCalGas written responses.

Please contact Troy A. Bauer at (909) 376-7208 if you have any questions or need additional information.

Sincerely,



Troy A. Bauer

CC:  
Terence Eng, SED  
Kan Wai Tong, SED

ATTACHMENT

**2017 SoCalGas Transmission Coastal Area - Inspection Unit  
(Goleta and Ventura)  
May 1 - 5, 2017**

**I. SED Identified Probable Violation**

1. Title 49 CFR § 192.481(a) states:

*“Each operator must inspect each pipeline or portion of pipeline that is exposed to the atmosphere for evidence of atmospheric corrosion, as follows:  
Onshore: At least once every 3 calendar years, but with intervals not exceeding 39 months.”*

During SED’s record review of Bridge and Span compliance inspection, SED noted that SoCalGas did not complete a compliance span inspection of L-404@ M.P. 28.32 Rock Hill on 5/13/2013 (Work Order #5187451) because the span was inaccessible due to poison oak. The previous inspection of the span was completed on 5/24/2010 (Work Order #3906141). SoCalGas inspected the span next on 3/9/2016 (Work Order #6048843), nearly 6 years after its previous inspection. Therefore, SCG is in violation of General Order 112-F, Reference Title 49 CFR, Part 192, Section §192.481(a).

**RESPONSE:**

The bridge & span inspection was not completed due to the presence of poison oak, however it was inspected by other methods and deemed safe as described below.

SoCalGas disagrees on the span not being inspected in the last 6 years. The segment referenced on L404 was smart pigged in April of 2014 and hydro tested in May of 2015. SoCalGas also conducted pipeline patrol for the time period 2013-2016 (April 8-2013, April 16-2014, and April 13-2015). Instrumented Survey was conducted in 2016 which verified that the pipeline is in good operating condition and not leaking.

**CORRECTIVE ACTION:**

SoCalGas will evaluate the current form completion process in order to prevent a recurrence.

## II. Areas of Concerns and Recommendations

1. While performing a field inspection along L-37 @ M.P. 24.98, SoCalGas noted a line marker was missing. A SoCalGas technician indicated that he would replace a new line marker and mark “No” in the Bridge & Span Inspection Checklist when asked “Are there any markers missing...?”. The technician should have marked it as “Yes” on the checklist due to its as-found condition and then state corrective action on the checklist (i.e. missing line marker replaced during inspection). SED recommends that SoCalGas technicians record the as-found condition and corrective actions while conducting operation and maintenance activities.

### **RESPONSE:**

During the recent inspection SoCalGas installed several additional pipe line markers. Maximo work orders always notes as left conditions for any work order performed.

SoCalGas will review SED’s recommendation for possible implementation of documenting as-found condition and stating corrective action on the inspection work order.

2. SED inspected a span on L-404 @ M.P. 11.05 (Darling Rd & Wells) and noted that the top half of the span was covered by a metal casing while the bottom half being exposed to the atmosphere. One end of the casing seemed to be very close or touching the span pipeline. SED recommends SoCalGas assess the conditions and determine if it is a shorted casing.

### **RESPONSE:**

SoCalGas conducted an inspection of the span in question and found casing is not shorted.