



Troy A. Bauer
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09/29/2017

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, Operation and Maintenance Inspection of Southern California Gas Company's (SoCalGas) Mid-City LA Region (Inspection Unit) from July 10, 2017 to July 14, 2017. The inspection included a review of the Inspection Unit's Patrolling, Leakage Survey, and Odorant records for calendar years 2013 through 2016 and field inspections of pipeline facilities in the Belvedere, Juanita and Hollywood Districts. 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 1 probable violation and 3 areas of concern. Attached are Southern California Gas Company's (SoCalGas) written responses.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Troy A. Bauer". It is positioned above a horizontal dotted line.

CC:
Terence Eng, SED
Kan Wai Tong, SED
Kelly Dolcini, SED

2017 SoCalGas Mid-City LA Region (Inspection Unit)
7/10/2017 to 7/14/2017

I. Probable Violations

1. Title 49 CFR § 192.13 states:

“(c) Each operator shall maintain, modify as appropriate, and follow the plans, procedures, and programs that it is required to establish under this part.”

SoCalGas' Gas Standard 189.005, Operation of Odorometer, Section 4.1 states:

“The odorometer should be sent to Capital Tool Repair at Pico Rivera (ML SC721A) every two years for calibration....”

On July 12, 2017, SED staff noted that a SoCalGas employee conducted an odorant intensity testing at 337 N. 3rd Street, Montebello, with a Bacharach odorometer (CT 68064) that had an expired calibration date of June 29, 2017. The calibration for this odorometer had been expired by 13 days. Therefore, SoCalGas is in violation of Title 49 CFR, §192.13(c) for failing to adhere to its procedure.

RESPONSE:

SoCalGas consents to this finding. The current calibration date was expired on the odorometer (68064) used. SoCalGas did issue another order on the same day for a second test to be completed with equipment that was within its calibration. The reads were the same and no issues were found. The odorometer (68064) was sent to our instrument shop to be calibrated. When completed there were no issues found with the unit. The Gas Standard was reviewed with the employee with emphasis on checking the calibration of machines prior to using them.

CORRECTIVE ACTIONS:

SoCalGas is considering enhancements to safeguard against future occurrences. The proposed solution is to require the calibration date to be entered onto the electronic or paper orders. This would then require the employee to check and record the calibration on each inspection. For the electronic order, the program would not allow the order to be completed if the calibration date is not current.

II. Areas of Concerns and Recommendations

1. During the field inspection, SoCalGas identified a code 3 leak at 5555 Washington Blvd, Los Angeles. Please provide SED an update on this leak.

RESPONSE:

The code 3 Leak order has been entered into SAP and placed onto the appropriate re-evaluation and repair cycles. Orders to address those required actions will be automatically processed through the SAP and Click systems. No further orders to repair have been issued since this code 3 was identified. We will continue to address this leak as per our standards.

2. While performing a patrolling inspection in the field, SED discovered that the Inspection Unit had installed small size line markers (curb markers) in the vicinity of its underground transmission line along Eastern Ave in the city of Commerce. The font and stroke sizes of the words on the line markers were smaller than what is required in Title 49 CFR, Part 192, Section 192.707 (d) (1). SED noticed that the transmission line involved was installed in an industrial area with vehicular traffic, and a full-size line marker was not impractical to install. SoCalGas claimed that the area was a Class 3 location, and all Class 3 locations can be deemed as “heavily developed urban areas”, thus full size line markers need not be installed. SED believes SoCalGas should make its best effort to install full-size line markers near lines in the interest of public safety, where practical. Therefore, SED recommends SoCalGas reconsider revising its procedure to redefine “heavily developed urban area”.

RESPONSE:

Title [49 CFR, Part 192, Section 192.707 \(d\) \(1\)](#) states that line marker lettering is not required to be standard size for “heavily developed urban areas”. The Company Gas Standard defines “heavily developed urban areas” as Class 3 and 4 locations. However, the Gas Standard does not limit these locations to using only curb markers, but instead allows the operating base to assess whether curb markers are more practical than other marker types for the given situation. SoCalGas will review our policy to determine if changes are warranted.

3. During the field inspection, SED inspected some emergency equipment and materials in the storage area in Belvedere district. SED observed some 2”, 4”, and 6” pre-tested polyethylene (PE) pipes with removable labels stored with other untested pipes. To avoid potential mix-ups with the removable labels, SED recommends SoCalGas secure the pre-tested and tested pipes in separate locations.

RESPONSE:

SoCalGas agrees with SED’s recommendation and will store pre-tested pipe separated and away from untested pipes. SoCalGas is also looking for potential solutions for permanent marking of the pre-test pipes that is not removable and will not impair the usability and integrity of the pipe for fusions.