

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



February 6, 2018

GI-2017-12-SCG-55-02C

Jimmie Cho, Senior Vice President  
Gas Operations and System Integrity  
Southern California Gas Company  
555 West 5<sup>th</sup> Street, GT21C3  
Los Angeles, CA 90013

**Subject: General Order (G.O.) 112-F Operation and Maintenance Inspection of Southern California Gas Company's Leak Survey and Patrolling Program in the NW Harbor Corridor Inspection Unit**

Dear Mr. Cho:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112-F Operation and Maintenance Inspection of Southern California Gas Company's (SCG) Leak Survey and Patrolling activities in the NW Harbor Corridor Districts (Inspection Unit) on December 4 - 8, 2017. The inspection included a review of the Inspection Unit's leak survey and patrolling records for calendar years 2014 through 2016 and random field inspections of pipeline facilities in the districts. SED staff also reviewed the Inspection Unit's Operator Qualification records, which included field observation of randomly selected individuals performing covered tasks.

A Summary of Inspection Findings (Summary), which contains probable violations and areas of concerns and recommendations identified by SED staff, is included as an attachment to this letter.

Please provide a written response indicating the measures taken by SCG to address the probable violations, areas of concerns, and recommendations within 30 days from the date of this letter.

If you have any questions, please contact Alula Gebremedhin at (415) 703-1816 or by email at [ag5@cpuc.ca.gov](mailto:ag5@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Kenneth A. Bruno".

Kenneth Bruno  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

Enclosure: Summary of Inspection Findings

cc: Troy Bauer, SCG Regulatory Compliance  
Dennis Lee, SED/GSRB  
Matt Epuna, SED/GSRB, Kan-Wai Tong, SED/GSRB

## SUMMARY OF INSPECTION FINDINGS

### I. Probable Violations

1. Title 49 CFR §192.383(b) states in part:

*“...The operator must install an EFV on any new or replaced service line serving a single-family residence after February 12, 2010, unless one or more of the following conditions is present:*

- 1) The service line does not operate at a pressure of 10 psig or greater throughout the year;*
- 2) The operator has prior experience with contaminants in the gas stream that could interfere with the EFV's operation or cause loss of service to a residence;*
- 3) An EFV could interfere with necessary operation or maintenance activities, such as blowing liquids from the line; or*
- 4) An EFV meeting performance standards in §192.381 is not commercially available to the operator.”*

And

**SCG's Gas Standard 180.0146, Excess Flow Valve (EFV) – Installation and Operation, states in part:**

*“1.1. An Excess Flow Valve (EFV) shall be installed as near as practical to the fitting connecting the service line to its source of gas supply on all NEW or REPLACED services to single family residences that meet the following criteria:...*

- 1.1.3. Multifamily installations with known combined customer loads at time of application up to 1000 cfh, and where the combined customer load is not expected to exceed the service capacity over time...”*

In reviewing the Inspection Unit's construction records, SED discovered that the Inspection Unit did not install an EFV during a service line replacement for single family homes located at:

1. 358 east 35<sup>th</sup> street, Los Angeles:- a ½ inch plastic service which was replaced on 02/17/2016 with Notification # 204005911 and Work Order # 540000076444
2. 10210 South Grevillea Avenue, Inglewood:- a ½ inch plastic service which was replaced with a Notification # 2040004758 and work order # 540000048966

SCG responded after the inspection stating (for both of them):

*“SoCalGas Response: We will get service replaced to install EFV at this address and will provide you with a copy of the records upon completion”*

Therefore, SCG is in violation of G.O. 112-F, Referenced Title 49 CFR §192.383(b), for its failure to install EFV on the replaced services.

2. Title 49 CFR §192.727(b) states in part:

*“(b) Each pipeline abandoned in place must be disconnected from all sources and supplies of gas; purged of gas; in the case of offshore pipelines, filled with water or inert materials; and sealed at the ends. However, the pipeline need not be purged when the volume of gas is so small that there is no potential hazard.*

And

SCG’s Gas Standard 184.0080, Abandonment of Gas Service and Gas Light Tab Assemblies, Section 4.2 Table 1, requires abandoned service with > 100 ft. to be purged as shown below.

4.2. *Purging of service lines: (See Table 1)*

***Abandoned Service Lines Purging Requirements***

<b><i>Nominal Diameter</i></b>	<b><i>100ft. in length or less</i></b>	<b><i>Greater than 100ft. in length</i></b>
<b><i>≤ 1” (less than or equal to 1”)</i></b>	<b><i>Purging Not Required</i></b>	<b><i>Yes*</i></b>
<b><i>&gt; 1” (greater than 1”)</i></b>	<b><i>Yes*</i></b>	<b><i>Yes*</i></b>

***Table 1***

In reviewing the Inspection Unit’s As-Built drawings, SED discovered that the Inspection Unit did not have a purging record for 284 ft. deactivated (retired) branch service with work order # 2000012649.

Therefore, SCG is in violation of G.O. 112-F, Referenced Title 49 CFR §192.727(b), for its failure to purge a deactivated (retired) branch service.

3. Title 49 CFR §192.605(b) (3) states:

*“(b) Maintenance and normal operations. The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.*

*(3) Making construction records, maps, and operating history available to appropriate operating personnel.”*

During its field observation of live leak survey, SED observed two survey plat maps have incorrect information as listed below:

1. A service line with its meter set is shown on the survey plat map (CMP.MP.C0201E) at 2411 East Anaheim Street, Willington ; however, service history record showed the service line was abandoned on March 1, 1989.
2. A service tab was shown on the survey plat map along Downey Road in Vermon; however, the line was abandoned in 2005. SCG personnel stated, he will issue a mapping correction.

Therefore, SCG is in violation of G.O. 112-F, Referenced Title 49 CFR §192.605(b)(3), for its failure to provide accurate survey maps for its operating personnel.

## **II. Areas of Concern / Recommendations/ Observations**

1. During SED field inspection of a live survey and patrol along Victoria Street in Carson, SED observed the leak surveyor perform the leak survey of the 3 service taps to CSU Dominguez Hills along the sidewalks and areas that are accessible to pedestrians. However, the portion of the service line from the main that run across Victoria Street was not surveyed. When asked, the SCG employee mentioned the safety concern of performing the leak survey in the middle of the street and also stated that gas is expected to migrate around the curb side, adding that RMLD does not work effectively on asphalt.

SED's review of SCG 223.0100, Section 5.2.5.4 requires check of all manholes and other street openings, while Section 5.2.5.5 provides more guidance for "long-side services" and use of equipment "where visible indications are present". Although we acknowledge the safety risk in performing leak surveys in the middle of the street, SED is concerned that certain possible areas of migration such as the manholes located in the middle of the street and unpaved street median within the vicinity of the long-side services are not surveyed for leaks.

Please provide SCG's plan to address this concern.

2. During SED's record review, SED found that the leak survey conducted on 06/26/2015 on MAP C-418-W, with work order # 520000966797 on 06/26/2015, showed two Code-3 leaks identified and both leaks resolved (one replaced service and the other still under monitor); however, those leaks were not documented on the leak survey map.
3. During field inspection of Patrol location for Pipeline 30-6205, SED observed the regulator station ID 617-P vent pipe was found to have a hole.

SCG later provided a work order that showed the completed repair work of the vent pipe hole.

This note serves only for the purpose of record and SCG need not to respond.