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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-F Operation and Maintenance Inspection of Southern California Gas Company's (SoCalGas) 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's staff identified three violations and had two 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,



Troy A. Bauer

CC: Dennis Lee, SED/GSRB
Matt Epuna, SED/GSRB
Kan-Wai Tong, SED/GSRB
Kelly Dolcini, 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 35th 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.

RESPONSE:

SoCalGas acknowledges that excess flow valves were not installed on the services identified by SED above when they were replaced in 2016.

CORRECTIVE ACTION:

SoCalGas has installed an excess flow valve at 358 East 35th Street and a curb valve at 10210 South Grevillea Ave., and provided the installation orders to SED.

1. Service Order 540000224661 at 358 East 35th Street, Los Angeles was completed on 12/21/2017.
2. Service Order 540000223584 at 10210 South Grevillea Ave, Inglewood was completed on 01/04/2018.

Additionally, SoCalGas will complete a system analysis of previous service installations completed after 2014. If it is determined an EFV needs to be installed at this time, SoCalGas will take the appropriate actions. SED will be notified of installations as required.

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

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

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.

RESPONSE:

In SoCalGas’ Gas Standard 184.0080, under the table referenced above, it states “*Purging shall be in accordance with STANDARD 182.0160, purging Pipelines and Components.”

Within Gas Standard 182.0160, it states the following:

4.2.8. Written Plan

- 4.2.8.1. An approved written plan should be available for all purging procedures.
- 4.2.8.2. Service lines and small diameter pipelines can be purged using the general procedures of this gas standard as the written plan. More complex purging operations require a specific detailed written plan.

Since this was a service line, Gas Standard 182.0160 could be used as the written plan, and a specific detailed written plan was not required for this job.

SoCalGas disagrees with SED's determination that it is in violation of GO 112-F and 49 CFR §192.727(b). The written plan for this purging procedure is in Gas Standard 182.0160.

CORRECTIVE ACTION:

Not applicable.

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, Wilmington ; 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 Vernon; 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.

RESPONSE:

SoCalGas acknowledges that the two referenced locations reflected incorrect information in the GIS maps and is taking steps to have the maps updated.

CORRECTIVE ACTION:

SoCalGas' ongoing GIS conversion process for services includes data from both legacy Atlas Sheets (graphically displayed) and Service History (tabular information). SoCalGas has been continually refining the data to better align GIS and Service History.

When a discrepancy is identified in either Service History or GIS from what is actually found in the field, employees should follow Gas Standard 184.0070, Preparation of Service Sketches, which provides the process for submitting corrections. A Data Update Request is submitted along with an Isolated Service Sketch Form to document the facilities as found in the field. Once this updated information is routed to the Region's Sketching department, the GIS information is updated.

SoCalGas sent an email reminder detailing this process to Gas Operations and the Leakage department on 03/02/18.

For the two services identified by SED above, updated documentation was routed to Compton's Sketching department, and updates to GIS were completed on 02/22/18.

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.

RESPONSE:

While performing leakage survey over a pipeline that is in the middle of a paved street, it is recommended that employees survey along the curb and gutters. The paved street acts as a membrane and venting gas is detected where the two paving materials (concrete and asphalt) meet.

SoCalGas' Gas Standard 223.0100 requires that employees search along the route of all services at locations where gas is most likely to vent using appropriate instrumentation. The detailed requirements include the following:

- 5.2.5.4. Check all manholes and other street openings such as valve casings, curb meter vaults, drains, water valves, meter boxes, street lighting, power, telephone, etc.
- 5.2.5.5 For long-side services it is necessary to visibly look for indications of possible leakage under the street such as: evidence of recent construction, foreign trench

marks, pavement cuts, bar holes, etc. along the service route. Where visible indications are present, use approved ground leak detection equipment such as DP-IR or RMLD.

The possible areas of migration that SED identified above are already addressed by SoCalGas since leak survey employees are required to check manholes and other street openings.

In addition, searching for leaks with leak detection equipment is only one aspect of performing quality surveys. Employees must also look for dead or dying vegetation and evidence of recent construction, foreign trench marks, pavement cuts, bar holes, etc. and take appropriate actions to identify if gas is leaking in those areas.

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.

RESPONSE:

SoCalGas acknowledges that the employee who conducted the referenced 6/26/15 leak survey failed to document pre-existing leaks on the map.

This employee was counseled on the proper way to document pre-existing leaks and supervision re-reviewed the policy with the employee.

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.