

**PUBLIC UTILITIES COMMISSION**

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



March 6, 2018

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

**GI-2017-05-SCG65-02ABC**

**Subject: General Order (G.O.) 112-F Comprehensive Operation and Maintenance Inspection of Southern California Gas Company's Northwest San Joaquin Valley Distribution Area**

Dear Mr. Cho:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112-F Comprehensive Operation and Maintenance Inspection of Southern California Gas Company's (SoCalGas) Northwest San Joaquin Valley Distribution Area (Inspection Unit) on May 15-19, 2017 for calendar years 2013 thru 2016. SED used the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety's "Inspection Assistant Form" as a reference guide to conduct the inspection. SED conducted field inspections of pipeline facilities in the Visalia, Hanford, Porterville, and Bakersfield Distribution districts within the Inspection Unit. SED's staff also reviewed the Operator Qualification program, which included field observation of randomly selected individuals performing covered tasks.

SED's staff noted one probable violation of G.O. 112-F, Reference Title 49 Code of Federal Regulations (CFR), Part 192, and made four recommendations. The probable violation and recommendations are noted in the attached "Summary of Inspection Findings".

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by SoCalGas to address the probable violation and the observations noted in the Summary of Inspection Findings.

If you have any questions, please contact Mahmoud (Steve) Intably, at (213) 576-7016.

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

CC: Mahmoud Intably, SED/GSRB, Matthewson Epuna, SED/GSRB, Kan-Wai Tong, SED/GSRB,  
Kelly Dolcini, SED/GSRB  
Troy Bauer, Sempra

## Summary of Inspection Findings

### 2017 SoCalGas' Northwest San Joaquin Valley Distribution Inspection May 15-19, 2017

#### **I SED Identified Probable Violations**

##### **Title 49 Code of Federal Regulation (CFR), Part 192, §192.353 Customer meters and regulators: Location.**

§192.353(a) Customer meters and regulators states in part:

*(a) Each meter and service regulator, whether inside or outside a building, must be installed in a readily accessible location and be protected from corrosion and other damage, including, if installed outside a building, vehicular damage that may be anticipated. However, the upstream regulator in a series may be buried.*

SoCalGas Gas Standard 185.0008 Meter Guard - Installation, Section 2, Procedure, 2.1, General, 2.1.2 states:

*"Meter guards are required where aboveground MSAs are within 3 feet of driveways, roadways, alleys, parking stalls, wheel bumpers, trash collection areas and areas where industrial equipment (forklifts, loaders, etc.) may operate."*

During the field inspection, SED's staff observed that the gas meter located at 212 N Oakview Ave, in the city of Farmersville was exposed to vehicular traffic.

SoCalGas did not identify and install appropriate barriers to protect the customer meter, regulator, and aboveground facilities from vehicular traffic at the aforementioned location. Therefore, SoCalGas is in violation of G.O. 112-F, Reference Title 49 CFR, Part 192 §192.353(a).

#### **II Concerns and Recommendations**

##### **1. Title 49 Code of Federal Regulation (CFR), Part 192 §192.321 Installation of Plastic Pipe**

§192.321(a) Installation of Plastic Pipe states:

*"Plastic pipe must be installed below ground level except as provided by paragraphs (g) and (h) of this section."*

§192.321(g)(1) states:

*"The operator must be able to demonstrate that the cumulative aboveground exposure of the pipe does not exceed the manufacturer's recommended maximum period of exposure or 2 years, whichever is less."*

SoCalGas Gas Standard 182.0140 PE Plastic Pipe-General Application Requirements, Section 1.2.3.1 bullet item one states:

*“The cumulative aboveground exposure of the pipe does not exceed two years”*

During the field inspection of SoCalGas’ Visalia Base, SED staff observed several ½" PE pipe rolls with manufacturing dates October 29, 2013 and July 16, 2013 were stored outside along with other PE pipes that had manufacturing years 2015, 2016, and 2017. SED has concern that long term exposure of plastic pipe to ultraviolet light can affect the performance of the pipe. The plastic pipes should not be exposed to ultraviolet light for more than the plastic pipe manufacturer’s recommended maximum period of exposure or a maximum of two years, whichever is less. Therefore, SED recommends that SoCalGas take the necessary steps to ensure that the expired PE pipes should be separated and deposited before they are used for transporting gas.

2. During Base inspection, SED’ staff reviewed SoCalGas’ “Emergency Binder” and noted that some of the procedures were not up-to-date. In addition, the “Emergency Binder” needs to be reviewed annually and updated as needed. SED recommends that SoCalGas review and update the “Emergency Binder” as needed but no less than once a year to ensure the most up to date procedures are on file in the “Emergency Binder”.
3. SoCalGas Gas Procedure 104.0195 MST Air Purification System (Blue Air Panel), Section 1.4 states:

*“A monthly calibration check of the Carbon Monoxide (CO) sensor must be performed and recorded”*

And 5.1 states:

*“A record of the monthly inspection and calibration of the MST Air Panel shall be kept with the unit and documented at the district”*

During Visalia Base inspection on May 18, 2017, SED staff noted that SoCalGas failed to perform the monthly inspection and calibration on the MST Air Panel unit CT70751. SED recommends that SoCalGas takes appropriate remedial action to ensure that the MST Air Panel unit’s inspected as required by the SoCalGas’ Gas Procedure 104.0195.

4. SoCalGas Gas Standard 184.0250 Halt Tool-Gas emergency Leak Clamp, Section 3.3 states:

*“It is the responsibility of the District/Base to ensure the Halt Toll is maintained and operating properly before each use. This tool has been changed to a simple hydraulic system and should be checked monthly with the rest of the base emergency equipment”*

During Bakersfield Base inspection on May 19, 2017, SED staff noted that the hydraulic Holt Tool leak clamp was not inspected on a monthly basis. SED recommends that SoCalGas take appropriate remedial action to ensure that the hydraulic Holt Tool leak clamp inspected as required by the SoCalGas’ Gas Standard 184.0250.

5. SoCalGas’ Gas Standard 184.0335 Steel Pipe Squeezer 6” through 12”, Section 4.7.1 requires a monthly inspection of the Steel Pipe Squeezer. During Bakersfield Base inspection on May 19, 2017, SED staff noted that SoCalGas did not inspect the Steel Pipe Squeezer tool to ensure that the pipe squeezer and equipment are in good working condition. SED recommends that SoCalGas take appropriate remedial action to ensure the pipe squeezer tool inspected in accordance with SoCalGas’ Gas Standard 184.0335.
6. SoCalGas’ Gas Standard 107.0287 GMI Gasurveyor-Combustible Gas Indicator (CGI), Section 4.3.4.2.1.2 states:

*“block the end of the sample line/probe ensuring the “Sample Fault” flag appears, (see Figure 8).”*

And the note states:

*“Using latex or Nitrile glove may be the easiest method to block the end of the sample line/probe since there are multiple sample points on the Bar Hole probe”*

SED observed SoCalGas’ crew failed to follow the instruction listed above when testing the probe for cracks or split before using it to ensure it is in good working condition. SED recommends that SoCalGas take the necessary steps to ensure that its employees comply with its procedure requirements prior to check for the presence of gas.