

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



March 2, 2021

GI-2020-10-SCG-64-02ABC

Mr. Rodger Schwecke, Senior Vice President
Chief Infrastructure Officer
Southern California Gas Company
555 West 5th Street, GT21C3
Los Angeles, CA 90013

Dear Mr. Schwecke:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission reviewed Southern California Gas Company (SoCalGas)'s response letter dated February 11, 2021, that addressed one (1) violation and five (5) areas of concern noted during the field inspection of a **General Order (G.O.)112-F Comprehensive Operation and Maintenance Inspection of SoCalGas' Inland East Distribution Area** (Inspection Unit) on October 26 through November 6, 2020.

Attached is a summary of SED's inspection findings, SoCalGas' responses to SED's findings, and SED's evaluation of SoCalGas' responses to the findings.

This letter serves as official closure of the 2020 Comprehensive Operation and Maintenance Inspection of SoCalGas' Inland East Distribution Area.

Thank you for your cooperation in this inspection. If you have any questions, please contact Randy Holter, Senior Utilities Engineer (Specialist), at (213) 576-7153 or by email at randy.holter@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Mahmoud Intably'.

Mahmoud (Steve) Intably, PE
Program and Project Supervisor
Gas Safety and Reliability Branch
Safety and Enforcement Division

cc: see next page

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Post-Inspection Written Preliminary Findings

Date: 12/28/2020

Dates of Inspection: October 26 – November 6, 2020

Operator: SOUTHERN CALIFORNIA GAS CO

Operator ID: 18484 (primary)

Inspection Systems: Distribution Districts Chino, Riverside, Corona

Assets (Unit IDs): Southeast - Inland East (87047)

System Type: GD

Inspection Name: 2020 SoCalGas Dist SE - Inland East

Lead Inspector: Randy Holter

Operator Representative: Alex Hughes

Violations

1. Generic Questions: Generic Questions (GENERIC.GENERIC)

Question Text Generic question - please provide context in result notes.

References 192.605 (a)

Assets Covered Southeast - Inland East (87047 (64))

Issue Summary On November 2, 2020, at 4290 Soto Ave, Riverside, SED observed SoCalGas' Employee #69079, performing a covered task per SoCalGas' Gas Standard 189.005, Operation of Odorometer. Employee #69079 failed to follow multiple sections of the Standard.

Title 49 CFR, Part 192, §192.605(a) states in part:

"(a) General. Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response."

a. SoCalGas Gas Standard 189.005, Section 3.2.7 states in part:

"Connect the sample line to the Odorometer. To avoid interference with the test, check for leaks preferably just using the nose to detect natural gas odor..."

During the Operation of Odorometer task performed by Employee #69079, the sample line disconnected from the odorometer multiple times, resulting in Employee #69079 inability to check for leaks according to the SoCalGas 189.005, Sec. 3.2.7 instructions. Employee #69079 was not able keep the sample line connected for

duration of the SoCalGas procedure. Employee #69079 did not stop to address the faulty connection nor did he attempt to contact his supervisor to seek advice on how to proceed.

b. SoCalGas Gas Standard 189.005, 3.2.8 states:

"Purge the Odorometer by slowly opening the Odorometer's gas flow control valve and then fully open the gas flow control valve on the Odorometer."

Employee #69079 failed to follow Section 3.2.8 when purging the odorometer; instead, he turned the odorometer's gas flow valve quickly, rather than slowly, to full open to purge the odorometer.

c. SoCalGas Gas Standard 189.005, Section 3.3.1 First readily detectable odor level, Sub-section 3.3.1.1 states in part:

"Open the gas flow control valve in small increments (i.e., rotameter ball raises 1 full division) to let gas into the sniffing chamber. At each rotameter increment, the operator should sniff the mixture..."

Employee #69079 did not follow Section 3.3.1.1 and sniff the mixture at each rotameter increment.

d. SoCalGas Gas Standard 189.005, Section 3.3.1 First readily detectable odor level, Sub-section 3.3.1.3 states in part:

"The concentration of gas in air is determined by the position of the float in the rotameter and the calibration chart on the cover of the Odorometer (see Figure 1)."

Figure 1 references "% gas in air when gas is first detectable" by using a calibration chart with a rotameter ball called Glass Float (black) to obtain the first readily detectable % gas in air.

Employee #69079 did not follow the steps of section 3.3.1 which requires black ball float in the rotameter to obtain the first readily detectable odor level "% gas in air". Instead, Employee #69079 read the silver tantalum float ball specified in section 3.3.2 odor intensity at 0.9% of gas in air.

e. SoCalGas Gas Standard 189.005, Section 3.3.2 Odor intensity at 0.9% gas in air, sub-section 3.3.2.2 states:

"Adjust the gas flow valve so that the rotameter is set to the position that will generate 0.9% gas in air, which is 1/5th of the lower explosive limit."

Employee #69079 did not adjust the gas flow valve to obtain the rotameter reading that generates a 0.9% gas in air mixture (1/5th of the low explosive limit).

Based on SED's observation, SED found that Employee #69079 failed to follow multiple sections of SoCalGas Gas Standard 189.005 to determine the odor intensity level. Therefore, SED found SoCalGas in violation of G.O. 112-F, Reference Title 49 CFR, Part 192, §192.605(a).

SoCalGas' Response:

SoCalGas acknowledges SED's concern and has taken the below corrective action measures to better enhance our safety practices and procedures.

SoCalGas' Corrective Action:

On 11/4/20, SoCalGas revisited the location and conducted another odorant test. Order #520002517005 was created and completed by another qualified employee. Employee #69079 and his supervisor were in attendance as well. Employee #69079 reviewed policy 189.005 (Operation of Odorometer) and observed the test conducted by the qualified employee. The refresher training was documented on Form 5300 and a copy was provided to SED during the audit.

Upon receipt of this violation, the employee was disqualified from performing Operator Qualification task 18.2 and was not permitted to perform the task until requalified. The employee's requalification and training were completed on 1/29/21. After successfully completing training, he was reinstated to resume Odorant Testing under task 18.2.

SoCalGas revised Gas Standard 189.005 (Operation of Odorometer) to clarify certain language. Specifically, section 3.3.1.1 now includes the text "**starting with the black ball**" to identify a starting point. Section 3.3.1.1. reads as follows:

3.3.1.1 - Open the gas flow control valve in small increments, **starting with the black ball** (i.e., rotameter ball raises 1 full division) to let gas into the sniffing chamber.

Additional policy revisions have been made to help distinguish between the black glass ball and the silver tantalum ball. Both are now identified as "ball" as opposed to "floats." SoCalGas published this policy update on 2/1/21.

SED's Conclusion:

SED has reviewed SoCalGas's response and accepts the proposed corrective actions. SED acknowledges that the proposed corrective action measures will promote and foster strong safety culture, and sufficiently address the probable violation. SED recommends no fine or penalty be imposed at this time. However, SED may review the implementation of the stated corrective actions during future procedures review.

Concerns

1. Records: Reporting (PRR.REPORT)

Question Text Have accurate records been maintained documenting mechanical fitting failures that resulted in hazardous leaks?

References 192.1009 (191.12)

Assets Covered Southeast - Inland East (87047 (64))

Issue Summary SoCalGas provided mechanical fitting failure (MFF) records per MFF Reports (PHMSA F-7100.1-2) kept for Inland East MFFs during the inspection timeframe (2017-2019). However, the *Inland East MFFs.xlsx* record did not note the street location or city where the MFF failure occurred for MFF# 52-2291692 which took place on 12/12/2019. Information drawn from the submitted MFF report and SoCalGas' records are as follows:

Failure Date	Repair Date	Reporting Date	MF#	District	Location	Fitting Involved
12/12/2019	12/12/2019	2/4/2020	520002291692	Chino		Socket Fusion
Type of fitting	Leak Location			Fitting Material		First pipe NPS
Coupling	BG; Outside; M-M			PE		4"

SoCalGas did not document the location of the MFF. SED recommends SoCalGas take the necessary steps to ensure records are traceable, verifiable, and complete.

SoCalGas' Response:

As stated by SED, SoCalGas provided the mechanical fitting (MFF) records kept for Inland East MFF during the inspection timeframe (2017-2019) as required by MFF Reports (PMHSA F-7100.1-2). SED's concern is "the street location or city" not appearing in the spreadsheet "*Inland East MFFs.xlsx*" for MFF# 52-2291692. The purpose of that spreadsheet is as a reference and not a record. The PDF files provided are the actual records that were submitted to PHMSA and acknowledged by SED as being acceptable. Had SED requested to see location records for MFF# 52-2291692 during the audit, the information was readily available and would have been provided. The following table was updated with the location information requested by SED:

Failure Date	Repair Date	MF#	District	Location	Fitting Involved
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12/12/2019	12/12/2019	520002291692	Chino	13553 Norton Ave, Chino	Socket Fusion First pipe NPS
Type of Fitting	Leak Location BG; Outside;	Fitting Material			
Coupling	M-M	PE			4"

SED's Conclusion:

SED has reviewed SoCalGas' response and accepts the corrective action that it has articulated. SED may review the records of the corrective actions during future inspections.

2. Records: Operations And Maintenance (PRR.OM)

Question Text Are construction records, maps and operating history available to appropriate operating personnel?

References 192.605(a) (192.605(b)(3))

Assets Covered Southeast - Inland East (87047 (64))

Issue Summary On Monday, November 2, 2020, while conducting a field inspection of SoCalGas' regulator station ID6619IE in the Riverside district, SED noted that the Intersection Drawing (I.D.) configuration of the station's components did not match the configuration found in the field per the component tags for the valves and regulators. For example, the valves and regulators for the property side run were labelled 1-2 on the I.D. while the component tags were labelled 3-4 and vice versa. During SED's field inspection, the pre-existing I.D. placed in the vault was corrected with handwritten markups until a revised version could be published. Per SoCalGas' correspondence on November 5, 2020, the component designations were corrected on the I.D. on November 3, 2020. However, upon review of the updated schematic on November 5, 2020, it was noted that the revision date on the I.D. was not updated.

SoCalGas stated they were working to fully revise the I.D. and, upon completion, would place a copy of the revised I.D. into the station vault. SED formally requests a follow up from SoCalGas pending resolution.

Update 11/11/2020: SoCalGas stated they had fully corrected the Intersection Drawing for Regulator Station ID-6619IE with the proper component placement and revision date. Additionally, GIS information for the asset has been updated and the hard copy was inserted into the vault on 11/10/2020. Upon review of photographic evidence and of the I.D. pdf provided by SoCalGas, SED considers these remediation actions to have fully addressed our original concern and considers this inspection item to be closed.

SoCalGas' Response:

As detailed in the Concern from SED, remediation actions have been fully addressed and this item is considered closed.

SED's Conclusion:

SED has reviewed SoCalGas' response and accepts the corrective action that it has articulated. SED may review the records of the corrective actions during future inspections.

3. Pipeline Field Inspection: Pipeline Inspection (Field) (FR.FIELDPIPE)

Question Text Is pipe that is exposed to atmospheric corrosion protected?

References 192.481(b) (192.481(c), 192.479(a), 192.479(b), 192.479(c))

Assets Covered Southeast - Inland East (87047 (64))

Issue Summary During a bridge and span inspection of S1031 in Chino District on October 29, 2020, an abnormal operating condition (AOC) was observed in the form of coating wrap damage on the exterior of the pipe. According to SoCalGas' Pre-Audit data response, the previous inspection conducted for S1031 on April 3, 2018 (WO# 520001753000) noted no abnormal operating conditions were observed.

After the SED field inspection, SoCalGas created a remedial Main Maintenance work order (WO# 52-2516736) slated for the week of November 30 - December 4, 2020 to repair the damaged coating wrap. Considering the AOC remediation is still in progress, SED requests a formal follow-up from SoCalGas upon completion.

Update 11/19/2020: SoCalGas stated that they have completed remedial maintenance for the observed coating damage as of November 17, 2020. A copy of the completed maintenance work order and photograph of the repair was submitted to SED for review. Upon review of the provided documents, SED has determined this concern has been fully addressed by SoCalGas and will be closing this inspection item.

SoCalGas' Response:

As detailed in the Concern from SED, remediation actions have been fully addressed and this item is considered closed.

SED's Conclusion:

SED may review the records of the corrective actions during future inspections.

4. Topical Content (OQ, PA, CRM): OQ Field Inspection (MISCTOPICS.PROT9)

Question Text Verify the individuals performing the observed covered tasks are currently qualified to perform the covered tasks.

References 192.801(a) (192.809(a))

Assets Covered Southeast - Inland East (87047 (64))

Issue Summary On the spreadsheet *D-SE Inland East (21 Employees).xlsx* submitted by SoCalGas to SED on October 27, 2020, SED noted that employee ID 61944 was evaluated via two or more evaluation methods for 20 operator qualification tasks. However, SED noted that the employee was evaluated solely via written examination for the following 9 tasks, valid from 2012 to 2017.

- Operate valves to discontinue service
- Telemeter device, recording gauges Dist.
- Inspecting/maintaining vaults
- Purging pipelines
- Leak testing non-welded joints
- General and localized corrosion-Dist.
- Monitoring for atmospheric corrosion
- Abandonment or deactivation of facility
- Stopcock change pipelines with pressure

Please provide SED with an explanation for using written examination as the sole evaluation method for the 9 listed tasks.

SoCalGas' Response:

At the time of the employee's evaluation in May 2012, the Operator Qualification department (OQ) used a written exam for initial operator qualification testing and performance evaluation. However, as a process improvement and at the guidance of the CPUC during the Operator Qualification inspection in 2013, OQ implemented performance testing for each initial operator qualification test. From 2013 to current, employees are given a written operator qualification test and a performance test on each task during their initial evaluation.

SoCalGas' Corrective Action:

The task qualification corrective action, consisting of two or more evaluation methods, was implemented in 2013.

SED' Conclusion:

SED has reviewed SoCalGas' response and accepts the corrective action that it has articulated. SED may review the records of the corrective actions during future inspections.

5. Topical Content (OQ, PA, CRM): OQ Field Inspection (MISCTOPICS.PROT9)

Question Text Verify the qualified individuals performed the observed covered tasks in accordance with the operator's procedures or operator approved contractor procedures.

References 192.801(a) (192.809(a))

Assets Covered Southeast - Inland East (87047 (64))

Issue Summary On November 2, 2020, at 4290 Soto Ave, Riverside, SED inspectors observed SoCalGas operator Employee #69079, ETD (operator) performing a covered task procedure as provided in SoCalGas Gas Standard 189.005, Operation of Odorometer.

Title 49 CFR §192.803 states in part:

"'Qualified' means that an individual has been evaluated and can (a) perform assigned covered tasks;"

Based on SED observation, Employee #69079 did not perform the covered task as required by SoCalGas' Gas Standard 189.005. SED recommends SoCalGas re-evaluate Employee #69079 to determine his ability to perform the covered task and to recognize and react to abnormal operating conditions.

SoCalGas' Response:

Upon receipt of this violation, the employee was disqualified from performing Operator Qualification task 18.2 and was not permitted to perform the task until requalified.

SoCalGas' Corrective Action:

The employee's requalification and training were completed on 1/29/21. After successfully completing training, he was reinstated to resume Odorant Testing under task 18.2.

SED's Conclusion:

SED has reviewed SoCalGas' response and accepts the corrective action that it has articulated. SED may review the records of the corrective actions during future inspections.