

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



February 26, 2018

Mr. Mark Williams, President ([mw7300@aol.com](mailto:mw7300@aol.com))  
West Coast Gas Company, Inc.  
9203 Beatty Drive  
Sacramento, CA 95826

GI-2017-11-WCG34-02C

SUBJECT: SED's Closure letter for the General Order 112-F Gas Inspection of West Coast Gas Company

Dear Mr. Williams:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted an inspection of West Coast Gas Company (WCG) on November 6 through November 9, 2017. The inspection included a review of the leak survey records, patrolling records, construction and repair records, and odor testing records for the period of January 1, 2014 through December 31, 2016. SED performed a field inspection of a representative sample of WCG facilities in the Mather Field area and Castle Air Field area. SED staff also reviewed WCG's Operator Qualification records, which included field observation of WCG personnel performing covered tasks.

A summary of the inspection findings documented by the SED, WCG's response to our findings, and SED's evaluation of WCG's response taken for each finding are outlined for each identified violation.

This letter serves as the official closure of the 2017 GO 112-F inspection of West Coast Gas, and any matters that are being recommended for enforcement will be processed through the Commission's Citation Program or a formal proceeding.

Thank you for your cooperation in this inspection. If you have any questions, please contact Jason McMillan at (916) 928-2271 or by email at [Jason.McMillan@cpuc.ca.gov](mailto:Jason.McMillan@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink that reads "Dennis Lee".

Dennis Lee, P.E.  
Program and Project Supervisor  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

Enclosure: Summary of Inspection Findings

cc: Ray Czahar, WCG ([rczahar@aol.com](mailto:rczahar@aol.com))  
Kenneth Bruno, SED  
Kelly Dolcini, SED  
Cynthia Morris, WCG ([westgas@aol.com](mailto:westgas@aol.com))

## **SUMMARY OF INSPECTION FINDINGS**

### **I. Probable Violations**

1. U.S. Department of Transportation Title 49, Code of Federal Regulations (CFR), §192.723(b)(1) states in part:

*A leakage survey with leak detector equipment must be conducted in business districts, including tests of the atmosphere in gas, electric, telephone, sewer, and water system manholes, at cracks in pavement and sidewalks, and at other locations providing an opportunity for finding gas leaks, at intervals not exceeding 15 months, but at least once each calendar year.*

SED found that leak surveys in the Castle area were performed between May 27-29, 2014, and the subsequent survey was performed on September 15, 2015. The interval between these surveys is greater than 15 months, and violates 49CFR §192.723(b)(1). WCG informed SED that this lapse represented period in which WCG was transitioning from using contractors for leak surveys, to performing them with their own personnel and equipment.

#### **WCG's Response:**

*"SED found that the leak surveys in 2014 for Castle were performed by Heath Consultants. The 2015 leak survey was performed by WCG personnel. WCG no longer uses an outside contractor to perform leak surveys. WCG now has informed and trained employees to perform that task. WCG has always leak surveyed 100% of its gas facilities every year. Since the training of WCG employees WCG has not and will not exceed the 15 month limit."*

#### **SED's Conclusion:**

SED has opted not to impose a fine or penalty at this time since the violation did not result in a hazardous condition to WCG employees or the public.

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

1. U.S. Department of Transportation Title 49, CFR §192.383(b) states in part:

*"Installation required. An excess flow valve (EFV) installation must comply with the performance standards in §192.381. 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."*

During the inspection, SED found that WCG did not have a written requirement or guidance in their Operation and Maintenance manual concerning the installation of EFVs on newly installed or replaced service lines. To ensure that no customer services had been installed or replaced without the proper EFV, SED reviewed replacement and installation records for the period between January 1, 2010 and December 31, 2016. SED found that WCG did not perform any service installations or replacements that would have required an EFV at the time. SED provided WCG of the new EFV requirements effective 4/14/17, and reminds WCG to draft written procedures within their O&M to include installation of EFVs in accordance with 49CFR §192.323(b).

**WCG's Response:**

*"WCG is in correspondence with GTS Consultants to assist in the EFV requirements. The WCG OME (Operations, Maintenance & Emergency) Manual will be revised and updated during its annual review. WCG will send CPUC SED Auditors and copy upon completion."*

**SED's Conclusion:**

SED determined that the proposed corrective action addresses the concern raised during the inspection. SED will review the revised procedure to ensure it complies with the regulation upon receipt from WCG or during future inspection.

2. During the field portion of the inspection, SED interviewed different WCG personnel concerning the process of probing for leaks using a barhole tool (referred to as a "bangy" in WCG's O&M manual). All WCG personnel gave answers that outlined effective barholing methods, but the answers differed from each other. Upon further review, SED found that the WCG procedure that requires barholing (MAINTENANCE 723: LEAKAGE SURVEYS) does not specify a minimum or maximum depth to drive the barhole tool. SED recommends that WCG provide written guidance on the proper minimum or maximum depth to drive the barhole tool and train personnel on the revised procedure.

**WCG's Response:**

*"SED found no procedure for barholing. WCG has added that procedure to its OME. See attached "Response II.2", additions are in red."*

**SED's Conclusion:**

SED acknowledges that WCG has added a new procedure to ensure barholing is performed safely by WCG personnel.

3. During the inspection WCG reported that they had recently changed their odor testing procedure, had purchased a new Odorometer, and had been trained in its use by Heath Consultants. At the time of the inspection WCG did not have a written procedure within its O&M manual concerning their new odor testing. Since the procedure changed in 2017, SED recommends that WCG write a new O&M procedure for their changed odor testing and train personnel on the new procedure prior to performing the required odor testing.

**WCG's Response:**

*"WCG purchased an Odorator II from Heath Consultants just before the CPUC audit. Mr. Patrick Jacobs of Heath Consultants gave all WCG personnel table top and field training, in the Mather commercial and residential areas, on the Odorator II. OME revision are attached see "Response II.3" along with Certificates of Achievement "Response II.3a"."*

**SED's Conclusion:**

SED acknowledges that WCG has added a new procedure regarding odor testing, and using the Odorator II correctly.

4. During the field portion of the inspection, WCG discovered three leaks on the Castle system: a grade 2 leak adjacent to Building 411 (at Heritage and C), a grade 3 leak at a valve near Building 1315, and a grade 3 in the parking lot

near 1920 Customer Care Way. Please provide an update on the corrective actions taken on all the leaks discovered during the SED inspection.

**WCG's Response:**

*"During the field audit at Castle with the CPUC auditors, WCG discovered one (1) Grade 2 Leak. This leak was on a line that went to an empty lot location. WCG closed 2 valves to isolate this line. The CPUC auditors confirmed that the Grade 2 Leak was isolated with the valves and posed no threat and we continued the field audit. The Grade 3 Leak was at a valve behind building 1315. This valve was flushed, greased and exercised. Leak was stopped with this maintenance.*

*The Grade 3 Leak in the parking lot at 1920 Customer Care Way is scheduled for excavation in the summer of 2018.*

*Documentation for the above 3 leaks are attached, see "Reference II.4".*

**SED's Conclusion:**

SED determined that WCG has created the necessary corrective action plan to address this concern. SED may opt to review the actions taken by WCG at a future date.

5. During the field portion of the inspection, SED observed two pipeline markers at Castle and one at Mather on which the warning stickers were damaged in such a way that rendered the operator phone number illegible. SED recommends that WCG replace the stickers on these markers with ones that comply with 49CFR §192.707(d)(2).

**WCG's Response:**

*"The line markers, 2 at Castle and 1 at Mather, found during the CPUC audit have been replaced with new line markers. WCG placed additional line markers at various locations in Castle and Mather."*

**SED's Conclusion:**

SED determined that the corrective actions performed by WCG sufficiently addressed the concern. SED may opt to test the corrective action at a future date.

6. During the field portion of the inspection SED observed one pipeline marker at Castle and one at Mather that had been damaged and had fallen over. SED recommends that WCG replace these markers with undamaged ones that comply with 49CFR §192.707.

**WCG's Response:**

*"WCG has taken the opportunity to replace these line markers with a more rigid triangular shaped line marker. See attached "Response II.6".*

**SED's Conclusion:**

SED determined that the corrective actions performed by WCG sufficiently addressed the concerns. SED may opt to test the corrective action at a future date.