

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 15, 2017

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

GI-2017-11-WCG34-02C

SUBJECT: 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.

SED's findings are noted in the Summary of Inspection Findings (Summary) which contains probable violations and areas of concerns, recommendations, and observations.

Within 30 days of your receipt of this letter, please provide a written response indicating the corrective actions and preventive measures taken by WCG to address the violations and observations noted in the Summary. If you have any questions, please contact Jason McMillan at (916) 928-2271 or by email at jason.mcmillan@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: Ray Czahar, WCG (rczahar@aol.com)
Kelly Dolcini, SED
Cynthia Morris, WCG (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.

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).

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.

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.
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.
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).
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.