Enclosure 1



Public Utilities Commission STATE OF CALIFORNIA

Citation Date: January 23, 2015 Citation #: ALJ 274 15-01-003 Operator ID#: 18484

SED Investigation Report - 8/26/14

<u>April 2013 SoCalGas East Area Transmission Region Audit Finding - Notice of Violation</u> <u>Utility did not control source of ignition within transmission facilities as required by</u> <u>49 CFR 192.751</u>

Utility: Southern California Gas Company

Utility Operating Unit: Southern California Gas Company East Area Transmission Region

Subject of Report: Audit Finding - The utility did not control source of ignition within

transmission facilities (two valve stations)

Audit Title: General Order 112-E Audit of SoCalGas' East Area Transmission Region

Date of Audit: April 8 - 19, 2013

SED Investigator: Jerry Palo Jr.

Summary:

1. 49 CFR §192.751 (Probable Violation in SED's 2013 SCG East Area Transmission Region audit letter)

"Each operator shall take steps to minimize the danger of accidental ignition of gas in any structure or area where the presence of gas constitutes a hazard of fire or explosion, including the following:

- (a) When a hazardous amount of gas is being vented into open air, each potential source of ignition must be removed from the area and a fire extinguisher must be provided.
- (b) Gas or electric welding or cutting may not be performed on pipe or pipe components that contain a combustible mixture of gas and air in the area of work.
- (c) Post warning signs, where appropriate."

The California Public Utilities Commission's (CPUC) Safety and Enforcement Division (SED) audit letter stated, "SED conducted an inspection of mainline valves on Line 6916 and observed a SoCalGas Region employee light a cigarette within 20 feet of valve station 140.42 - 0 in Cabazon and inside valve station 120.00 in 29 Palms. <u>Per</u> SoCalGas procedure 166.015, Section 4.2, company personnel must control sources of



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ignition, not limited to cigarettes, within transmission and storage facilities. Smoking is prohibited inside the valve station in 29 Palms and within 50 feet outside the valve station in Cabazon."

Therefore, SoCalGas is in violation of GO 112-E, Reference Title 49 CFR Part §192.751

Findings:

The staff of the Safety and Enforcement Division (SED), Gas Safety and Reliability Branch (GSRB) conducted a General Order 112-E audit of Southern California Gas Company (SoCalGas) East Area Transmission Region from April 8 – 19, 2013. The inspection included a review of the Region's records and field activities throughout the period of April 2012 – March 2013. SED staff also reviewed SoCalGas' operator qualification records and included field observations of randomly selected individuals performing covered tasks.

On September 18, 2013, SED staff notified SoCalGas of its audit finding, consisting of one violation of the code of federal regulations and four areas for recommendation. The four recommendations sought to improve SoCalGas' transmission operation in which SED has accepted. The violation found, where SoCalGas failed to control a source of ignition for two valve stations, is a violation of 49 CFR §192.751. This violation is considered to have serious public safety implications.

On December 18, 2013, SoCalGas responded to SED's entire audit findings by stating, "Our review of notes from this audit indicates a slight difference in locations and valve station numbering involving an employee smoking. Our records indicate smoking inside a fenced valve station enclosure occurred at valve station 140.42-0 in 29 Palms, and outside a valve station enclosure at valve station 120.00 in Yucca Valley. The fenced valve station 140.42-0 was approximately 440 feet by 440 feet, and marked "no smoking." Our employee indicated that he was indeed smoking inside the closure, approximately 80 feet from the valve equipment. Regarding valve station 120.00, our employee was observed smoking outside the valve station enclosure, in an area that the employee and his manager who was on site both believed safe and would not create a source of ignition in a gaseous atmosphere."

In the same response letter to SED, SoCalGas proposed the following corrective action, "Employee was counseled to focus on surroundings, potential for gas hazard, and to obey posted "no smoking" signs, even if they are a significant distance from any potential gas hazard. Gas Standard 166.0015 "Fire Prevention and Protection - Transmission and Storage" is being reviewed with all East Area Transmission field employees."

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Recommendations:

It is imperative that SoCalGas operate its gas systems in compliance with GO 112-E and in a manner that promotes and safeguards the health and safety of the public. However, by not controlling a source of ignition for two valve stations in its East Area Transmission Region, SoCalGas potentially created a hazardous condition for the public or utility employees.