

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



August 14, 2015

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-2015-05-  
SCG57-02A

**Subject: General Order (G.O.) 112 Operation and Maintenance Inspection of Southern California Gas Company's Cathodic Protection Facilities in the Mid-City LA District<sup>1</sup>**

Dear Mr. Cho:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112-E Operation and Maintenance Inspection of Southern California Gas Company's (SCG) Cathodic Protection (CP) Facilities in the Mid-City (Inspection Unit) on May 4-8, 2015. The inspection included a review of the Inspection Unit's cathodic protection and odorant records for calendar years 2013 and 2014 and random field inspections of pipeline facilities in the Belvedere, Juanita, and Hollywood districts. SED staff also reviewed the Inspection Unit's Operator Qualification records, which included field observation of randomly selected individuals performing covered tasks.

SED staff identified one probable violation of G.O. 112, Reference Title 49 Code of Federal Regulations (CFR), Part 192 during the course of this inspection. SED also made two recommendations and several observations during the course of this inspection. These are described in the "Summary of Inspection Findings", which is enclosed with this letter.

Please provide a written response within 30 days of receipt of this letter indicating any updates or corrective actions taken by SCG. Pursuant to Commission Resolution ALJ-274, SED staff has the authority to issue citations for each violation discussed during the inspection. SED will notify SCG of the enforcement action it plans to take after it reviews SCG's inspection response.

If you have any questions, please contact Willard Lam, at (415) 703-1327.

Sincerely,

Kenneth Bruno  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

*Kenneth B 8/14/15*

CC: Willard Lam, SED/GSRB  
Jeff Koskie, Sempra  
Kan Wai Tong, SED/GSRB  
Matthewson Epuna, SED/GSRB

<sup>1</sup> General Order 112-F was adopted by the Commission on June 25, 2015 via Decision 15-06-044.

## Summary of Inspection Findings

### 2015 SCG Mid-City LA Inspection

May 4-8, 2015

#### I. SED Identified Probable Violations

##### Title 49 CFR Part 192, Section 192.465(d) – External Corrosion Control: Monitoring

*“Each operator shall take prompt remedial action to correct any deficiencies indicated by the [external corrosion control] monitoring.”*

The May 19, 1989, Federal Pipeline and Hazardous Materials Safety Administration’s (PHMSA) Inspection Guideline and Interpretation #PI-89-006 for 192.465(d) states that, as a rule of thumb, PHMSA interprets “prompt” as having the “correction completed by the time of the next scheduled monitoring”.

SED found numerous Cathodic Protection (CP) packages to be deficient for intervals exceeding SCG’s routine monitoring frequency defined in SCG Gas Standard 186.0135, and as required in 49 CFR §192.465(d). The CP Packages are listed in Attachment A and Table 1 below.

SED recognizes that in some instances, factors outside of SCG’s control may be the cause of delay for restoring deficient CP packages (i.e. environmental, permitting, moratoriums, etc.). However, SED observed the cause of delays for the locations in Table 1 to be within the control of SCG. For example, CP technicians would list “not enough time to troubleshoot package” for action taken or “area needs new anodes” yet the lengthy installation of new anodes does not restore the CP package. SED believes the delays in restoring CP deficiencies were manageable by SCG and therefore violations of CFR 192.465(d).

**Table 1.** Deficient CP Packages

District	Area	Date Deficiency Identified	Date noted CP Package submitted to SCG planning department	# of Days Deficient
Belvedere	C0405E-7	4/11/2012	4/26/2013	1101
Hollywood	ADA038-4	11/13/2013	1/12/2015	520
Hollywood	BEV119-5	5/22/2013	9/5/2014	695
Hollywood	BEV067-3	9/18/2012	1/23/2014	941
Juanita	SIL044-1	11/29/2012	1/23/2013	869
Juanita	SIL042-1	9/23/2011	2/28/2012	1302

Provide SED with a status update on the remediation of the CP packages listed in Attachment A and Table 1 above.



## II. Concerns, Recommendations, and Observations Summary

1. During a 5/6/15 visit to 3632 West 6<sup>th</sup> Street and South Harvard Boulevard in Los Angeles, SED observed heavy atmospheric corrosion on the aboveground piping and fittings on the meter assembly during a pipe to soil reading. SCG recognized the concern and remediated the atmospheric corrosion within a week of the field visit. This note serves as a record of the observation.
2. During a 5/5/15 field visit to 312 N 4<sup>th</sup> Street in Los Angeles, SED discovered a meter assembly with insufficient protection from vehicle impact. The meter assembly is located adjacent to the residence's driveway, exposing the meter assembly to a risk of impact. Meter protection was currently installed however, it was not placed in the location most likely to experience impact damage. SED recommends SCG install meter protection in the location that offers the most protection from vehicular impact. Provide SED with an update on SCG's actions at this location.
3. During a 5/6/15 field visit to 6341 Lindenhurst Avenue in Los Angeles, SED discovered the regulator vent piping of the meter assembly did not extend far enough outside to allow any escaping gas to vent to atmosphere in the event of a regulator failure. SED recommends SCG extend the regulator vent piping away from the crawl space minimize the risk of any gas accumulation in the event of a regulator failure. Provide SED with an update and photo(s) of the remediation at this location.
4. During a 5/6/15 field visit to 350 South Mcarty Drive in Los Angeles, SED discovered the service riser bypass and shut-off valve buried in a newly poured concrete slab walkway. The contractor responsible for pouring the concrete slab and preventing access to the shut-off valve was present during the field visit. SCG planned to schedule a follow up visit to ensure remediation of the buried riser bypass and shut-off valve. Provide SED with an update and photo(s) of the remediation at this location.

5. During field visits to CP read locations (read points), SED observed numerous read points to still have deficient levels of cathodic protection since the last read date or to currently have deficient levels of cathodic protection since an adequate last read. Table 2 outlines the read points observed during the field visits. Provide SED with an update on the remediation of each deficient read location listed in Table 2.

**Table 2.** Field Visit Deficient Pipe-to-Soil Read Locations

District	Area	Point	Location	SCG Last Maintenance Date	Last Read (Volts)	SED Field Visit Read (Volts)
BELVEDERE	C0381E-5	D	5009 ASTOR AVE	1/28/2014	-0.803	-0.842
BELVEDERE	DOW035-4	A	7119 WATCHER	12/10/2013	-0.833	-0.754
HOLLYWOOD	ADA002-8	B	6534 HAYES DR	5/22/2013	-0.846	-0.732
HOLLYWOOD	ADA007-3	C	742 PLYMOUTH	12/2/2013	-0.882	-0.735
HOLLYWOOD	BEV120-3	B	305 S. CRESCENT	6/21/2013	-0.85	-0.726
HOLLYWOOD	HOL023-1	Q	8010 OCEANUS	11/6/2014	-0.882	-0.535
HOLLYWOOD	HOL038-8	E	2401 CANYON DR	6/5/2014	-0.854	-0.33
HOLLYWOOD	HOL047-4	D	ETS/EIJ N/E CARLOS & GOWER	11/3/2014	-0.854	-0.739
HOLLYWOOD	HOL048-9	C	1803 TAFT AVE	7/25/2013	-0.85	-0.751
HOLLYWOOD	HOL074-5	A	1042 N STANLEY	7/5/2013	-0.85	-0.76
HOLLYWOOD	HOL081-4	B	ETS RANGLEY ALMONT PKWY	6/11/2013	-0.85	-0.416
HOLLYWOOD	HOL083-7	F	7950 MELROSE AVE	6/14/2013	-0.85	-0.717
HOLLYWOOD	HOL101-1	E	301 DOHENY DR	9/24/2014	-0.85	-0.785
HOLLYWOOD	PAL009-1	A	350 S MCARTY DR	3/26/2013	-0.85	-0.77
JUANITA	ADA019-4	H	820 FEDORA ST	12/10/2014	-0.819	-0.765
JUANITA	HOL070-6	D	1322 L RON HUBBARD WY	9/16/2013	-0.85	-0.632
JUANITA	HOL070-7	A	4619 LEXINGTON AV	10/01/2014	-0.846	-0.796
JUANITA	SIL021-3	B	3676 AMESBURY RD	9/11/2014	-0.854	-0.625
JUANITA	SIL032-5	E	2829 3/4 ROWENA AV	11/5/2014	-0.85	-0.78
JUANITA	SIL042-1	A	1841 GRIFFITH PARK BL	11/18/2013	-0.81	-0.64
JUANITA	SIL044-1	A	2107 INDIA ST	11/15/2013	-0.554	-0.678
JUANITA	SIL055-1	G	ETS O/M 2646 QUEEN ST	11/15/2013	-0.888	-0.749
JUANITA	SIL063-6	B	2322 EWING ST	12/12/2014	-0.85	-0.731
JUANITA	SIL071-1	B	LOCKWOOD & VIRGIL	9/17/2013	-0.854	-0.605
JUANITA	SIL102-5	C	324 N LA FAYETTE PARK PL	5/9/2014	-0.854	-0.83
JUANITA	SIL103-3	C	1306 TEMPLE ST ETS	5/9/2013	-0.882	-0.755
JUANITA	SIL112-1	A	253 S CRANDELL ST	4/1/2014	-0.892	-0.758
JUANITA	SIL113-1	E	343 N. UNION AVE	1/2/2014	-0.85	-0.761
HOLLYWOOD	CP10		226 S La Fayette Park, Los Angeles	12/18/2013	-0.56	-0.269
HOLLYWOOD	CP10		458 H June, Los Angeles	2/9/2004	-0.9	-0.688
HOLLYWOOD	CP10		711 N Beverly Drive, Beverly Hills	6/23/2003	-1.15	-0.839
BELVEDERE	CP10		1219 Stone Street, Los Angeles	5/29/2013	-0.85	-0.33
LOS ANGELES	CP10		2441 Folsom, Los Angeles	12/12/2013	-0.69	-0.463
LOS ANGELES	CP10		2700 Malabar Street, Los Angeles	12/22/2003	-0.85	-0.755



### Attachment A

Area	Initial Down Date	Last Read Date	Number of Days Out Of Tolerance	Protection Type
HOL087-1	01/23/2012	04/15/2015	1180	Magnesium
HOL072-4	04/21/2012	04/07/2015	1091	Magnesium
SL 33-12-1	11/01/2012	04/16/2015	897	Rectifier
SIL055-1	11/29/2012	03/27/2015	869	Magnesium
HOL087-4	11/30/2012	04/15/2015	868	Magnesium
ADA001-7	12/08/2012	03/30/2015	860	Magnesium
BEV110-1	01/24/2013	04/06/2015	813	Magnesium
BEV050-1	03/15/2013	04/08/2015	763	Rectifier
SL 33-07	06/03/2013	04/02/2015	683	Rectifier
HOL086-2	07/26/2013	04/09/2015	630	Magnesium
HOL102-9	08/01/2013	04/01/2015	624	Rectifier
HOL023-1	08/02/2013	04/08/2015	623	Rectifier
CEN028-2	08/21/2013	04/02/2015	604	Magnesium
BEV006-1	08/22/2013	04/14/2015	603	Magnesium
CEN023-B-2	11/07/2013	03/27/2015	526	Magnesium
HOL011-1	11/13/2013	04/01/2015	520	Magnesium
HOL087-3	11/18/2013	04/15/2015	515	Magnesium
ADA025-2	12/03/2013	04/08/2015	500	Magnesium
ADA027-5	12/03/2013	03/25/2015	500	Magnesium
BEV017-3	12/05/2013	04/02/2015	498	Magnesium
DOW035-3	12/10/2013	03/26/2015	493	Magnesium
PAL010-4	12/10/2013	04/07/2015	493	Magnesium
CEN058-4	12/11/2013	03/31/2015	492	Magnesium
SIL072-11	12/13/2013	03/31/2015	490	Magnesium