



September 8, 2017

Ms. Kim West
Acting Director, Western Region
Pipeline and Hazardous Materials Safety Administration
12300 W. Dakota Ave., Suite 110
Lakewood, CO 80220

CPF 5-2017-0012M

Dear Ms. West:

I received your Notice of Amendment regarding several apparent inadequacies found within the Island Energy plans or procedures. This letter is respond to your letter and inform you of the actions we have taken to address these inadequacies.

Issues 1 (regarding §192.605) and 2 (regarding §192.613)

After receiving the June 2017 Post Inspection Preliminary Findings from Mr. Jason Dunphy we took several actions:

1. An inspection of the splash zone and underwater portions of the gas main was conducted by Global Diving and Salvage Inc. The inspection showed the pipe and external coatings to be in good to excellent condition. Sacrificial anodes were estimated to have 85% of their initial material intact. Similar inspections will be conducted at least every ten years.
2. A visual inspection of the gas pipe attached to the causeway, its protective coating and associated hangars was contacted by drone and boat. No issues of concern were discovered. Similar inspections will be conducted at least every 3 years.
3. Advice was solicited from GTS, our consulting gas engineers, on use of changes in cathodic protection measurements to provide better monitoring of external and atmospheric corrosion.
4. The Continuing Surveillance, External Corrosion Control – Monitoring, & Atmospheric Corrosion Inspection sections of the Island Energy Operations & Maintenance (O&M) Manual have been amended to specify the inspections and measurements referenced above. These sections and associated report forms are attached.

Issue 3 (regarding §192.615)

We disagree with the assertion that 'The Island Energy Emergency Plan does not address or contain procedures arising from a leak or failure on the main installed on the Mare Island Causeway or under the Napa River ship channel.' We believe the documented procedures for a Minor or Major Gas Leak are appropriate to leaks and failures on the Causeway or in the ship channel. We have, however, added the U.S. Coastguard to the list of agencies who may notify us of an emergency and the agencies who should be notified in case of an emergency. The U.S Coastguard has also been added to the list of local safety agencies to receive annual emergency response information as detailed in our public awareness plan. Our updated emergency plan, emergency telephone list and Public Awareness Plan are attached.

Issue 4 (regarding §192.616)

There are no dredging or shipping companies active on the Napa River in the vicinity of the causeway. There has been no dredging in the river channel under the causeway bridge in 20 years. Occasionally, barges containing dredge material from other locations pass under the Causeway. We believe these barges are bringing material to support a wetlands remediation project under the control of Duck Unlimited. With respect to stakeholders on the Vallejo side of the Napa River, there are no Vallejo residents within our coverage area for public information. We define the coverage area on the Vallejo side of the Napa River by a 400-foot radius around Island Energy gas facilities. Businesses on the Vallejo side of the Napa River within 400 feet of our facilities have been included in our public awareness plan for 4 years. We were advised to include these businesses as stakeholders after a previous PHMSA inspection.

The following actions have been taken in response to Issue 4:

1. Annual communication to the local Ducks Unlimited office has been added to our Public Awareness Plan to alert them to the presence of the pipeline under the Causeway.
2. The Line Markers section of O&M Manual has been amended to indicate large signs will be placed on the piers on each side of the Causeway channel to alert river traffic of the presence of an underwater gas pipe.

A copy of the Line Markers section on the O&M Manual and our Public Awareness Plan are attached as is a mockup of the sign placed on the Causeway piers.

No response to this letter is necessary if our actions are deemed to be sufficient. However, we would appreciate your office notifying us if additional actions are required.

Sincerely,



Peter M. Guadagni
General Manager
Island Energy