



09 November 2020

Mr. Dustin Hubbard  
Director, Western Region  
Pipeline and Hazardous Materials Safety Administration  
US Department of Transportation  
12300 W. Dakota Ave.  
Lakewood, CO 80228

**Subject:** 2020 Island Energy CPUC / DOT Gas Distribution System Audit  
**Regarding:** Notice of Amendment CPF 5-2020-003-NOA  
Notice of Probable Violation CPF 5-2020-004-NOPV

Dear Mr. Hubbard,

Island Energy is in receipt of and has reviewed the subject “Notice of Amendment” and “Warning Letter” documents. We have also reviewed the forwarded “Response Options” instructions. In summary:

**Notice of Amendment CPF 5-2020-003-NOA**

§192.805 Qualification Program

“The Island Energy Operator Qualifications manual does not contain a procedure for notifying the CPUC, a state agency participating under 49 U.S.C. Chapter 601, if the operator significantly modifies the program after the CPUC has verified that it complies with Section 192.805.”

“In the Reporting/Notification section of the Island Energy Operator Qualification manual, it states that, “All Plan revisions that effect operations, maintenance and emergency response procedures are to be communicated to all appropriate personnel at the earliest opportunity.” Island Energy should revise this section to clearly state that the CPUC must be notified and how to make such notifications for significant OQ program changes.”

**Response:** Island Energy does not contest the subject Notice of Amendment and has updated the Reporting/Notification section within the O&M Manual to reflect the Amendment. Please refer to the attached Exhibit A.

**1. §192.616 Public Awareness.**

(a) . . .

**(d) The operator's program must specifically include provisions to educate the public, appropriate government organizations, and persons engaged in excavation related activities on:**

- (1) Use of a one-call notification system prior to excavation and other damage prevention activities;**
- (2) Possible hazards associated with unintended releases from a gas pipeline facility;**
- (3) Physical indications that such a release may have occurred;**
- (4) Steps that should be taken for public safety in the event of a gas pipeline release; and**
- (5) Procedures for reporting such an event.**

“The Island Energy Public Awareness Program procedures do not identify dredging companies as individual stakeholders. Island Energy operates a pipeline main that passes under the Napa River ship channel. This issue was cited by Western Region in CPF 5-2017-0012M, Item 4.”

**Response:** Island Energy has identified one (1) dredging/commercial company that periodically transects the Mare Island Causeway Bridge. No other commercial traffic was identified. The dredging company is “Lind Marine”, which is also an Island Energy Customer.

In addition to Customer notifications, Island Energy will provide separate and specific printed information and One-Call Center outreach on an annual basis to the dredging company per API RP 1162 Section 2.8, Table 2-1.4 “Excavators and Contractors”.

Such outreach information to include pipeline size and location on the bridge, location within the Napa River (including isometrics), and advisories on physical indications of a release, public safety actions, and procedures for emergency or other related notifications. The O&M manual to be revised accordingly.

**2. §192.616 Public Awareness**

(a) . . .

**(c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.**

“Island Energy failed to deliver materials and messages to the Coast Guard in 2019. Table 2-1 of API RP 1162 requires an annual frequency to Emergency Officials.”

“See CPF No. 5-2017-0012M, Operator Response at 2 (Sept. 8, 2017) (on file with PHMSA) (noting that “[t]he 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”) and Attachment (updated procedures).”

**Response:** The local Coast Guard Station was added to the O&M subsequent to CPF 5-2017-0012M. See the screen shot below. However, as identified by the audit, we are not finding evidence that an outreach notification letter was actually sent to the USCG.



**Procedural Manual for Operations, Maintenance and Emergencies**

Form 615-2	Approval Date:
Revision date: 2/07/20	Supersedes: All previous date's

**Emergency Telephone List**

**SCHOOLS**

MARE ISLAND ELEMENTARY SCHOOL	(707) 556-8560
TOURO UNIVERSITY	(707) 638-5259

**US COAST GUARD**

Causeway Station 2 Harbor Way Vallejo, Ca 94590	(707) 643-2975
Mare Island Pier 35 Station	(415) 556-2760
Mare Island Preservation Hill Station	(415) 399-3520

We have also learned that the USCG Vallejo “Causeway Station” listed above has apparently been out of service for some time.

With the Causeway Station out of service, Island Energy has identified Carl Hausner, Chief, Bridge Section, Eleventh Coast Guard District as the senior and most appropriate contact within the USCG for Mare Island Causeway Bridge emergency and annual safety notifications. His office is located on Coast Guard Island, Alameda CA.

Island Energy will provide separate and specific printed information outreach on an annual basis to the USCG Regional Bridge Section per API RP 1162 Section 2.8, Table 2-2.1 “Emergency Officials”.

**3. §192.616 Public Awareness**

(a) . . .

**(c) The operator must follow the general program recommendations, including baseline and supplemental requirements of API RP 1162, unless the operator provides justification in its program or procedural manual as to why compliance with all or certain provisions of the recommended practice is not practicable and not necessary for safety.**

“Island Energy was not able to provide documentation that it had conducted an effectiveness review of the Public Awareness Program, nor was able to provide justification in its program or procedural manual as to why compliance with this

effectiveness review was not practicable and not necessary for safety. An Effectiveness review is required by API RP 1162 Section 8.4.”

**Response:** Island Energy has begun the process of developing an “Effectiveness Review” program per API RP 1162 Section 8.4 and 8.5. Island Energy intends to execute on the program 1Q2021 and within the 180 days required by the subject NOPV.

Should you have any questions or require additional information, please advise. My contact information follows below.

Sincerely,

*Douglas W. Buchanan*

Douglas W. Buchanan, PE  
Power Company Manager

**CONTACT INFORMATION:**

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(925) 596-0527 c

Email: [dougbuchanan@ci.pittsburg.ca.us](mailto:dougbuchanan@ci.pittsburg.ca.us)

## Exhibit A



### Procedural Manual for Operations, Maintenance and Emergencies

Sub Part L: Operations	Approval Date:
Revision date: 11/05/2020	Supersedes: All previous date's

#### Public Awareness

#### Operator Qualification (OQ) Procedure Change Notification

In the event of a significant or material change in the use, application or content of the approved Operator Qualification (OQ) Manual or process, or in the adoption of a new third-party program, Island Energy, per PHMSA §192.805, shall immediately notify the PHMSA Administrator and the State Agency participating under 49 U.S.C. Chapter 601.

1. Notifications to the Pipeline and Hazardous Materials Administration (PHMSA) are to first be submitted by electronic mail to [InformationResourcesManager@dot.gov](mailto:InformationResourcesManager@dot.gov), followed by regular mail to:

ATTN: Information Resources Manager  
DOT/PHMSA/OPS\  
East Building, 2nd Floor, E22-321  
New Jersey Avenue SE., Washington,  
DC 20590.

(or as otherwise listed within  
49CFR192.805(i))

2. Notifications to the California Public Utilities Commission (CPUC) are to first be submitted by electronic mail to [terence.eng@cpuc.ca.gov](mailto:terence.eng@cpuc.ca.gov), followed by regular mail to:

ATTN: Terence Eng, P.E.  
Program Manager, Gas Safety and  
Reliability Branch  
Energy Division  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

415-577-7658 (cell)

#### RELATED CODE PROCEDURES

49 CFR § 192.616: Public Awareness

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Revised by: Island Energy 2011 - 2020

## Exhibit A

(Cont.)



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### Emergency Telephone List

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#### SCHOOLS

MARE ISLAND ELEMENTARY SCHOOL (707) 556-8560  
TOURO UNIVERSITY (707) 638-5259

#### US COAST GUARD

##### Eleventh Coast Guard District

Attn: Bridge Office (510) 437-3516

Commander (dpw)  
Eleventh Coast Guard District  
Coast Guard Island, BLDG 50-2  
Alameda, CA 94501-5100

Carl Hausner  
Chief, Bridge Section  
[Carl.T.Hausner@uscg.mil](mailto:Carl.T.Hausner@uscg.mil)

Mare Island Pier 35 Station (415) 556-2760

Mare Island Preservation Hill Station (415) 399-3520

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