



23 September 2019

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

Subject: 2019 Island Energy CPUC / DOT Gas Distribution System Audit
Regarding: Notice of Amendment CPF 5-2019-0020M
Warning Letter CPF 5-2019-0021W

Dear Mr. Hubbard,

Island Energy is in receipt 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 5-2019-0020M

Update the Island Energy O&M Manual regarding telephonic reporting to be within one (1) hour - not two (2) hours.

- Island Energy does not contest the subject Notice of Amendment and has updated the O&M Manual to reflect the amendment. Please refer to the attached Exhibit A.

Warning Letter CPF 5-2019-0021W

Although a written response is not required by the "Response Options" instructions, Island Energy wishes to demonstrate and confirm that it has taken proactive actions to address the noted deficiencies:

1) Missing the 2018 Mailing List of Public Officials

Corrective Actions:

- i) Provide the 2018 Mailing list, or
- ii) Provide 2019 Mailing List and note the process for keeping the list updated each year.

Response: Attached as Exhibit B is the 2019 mailing list. As an element of its annual O&M Manual review, Island Energy will review and update the mailing as part of its "Public Awareness" requirements. The list will also be updated as Island Energy becomes aware of management or contact changes with the various agencies and entities with which it communicates.

- 2) Abandonment Forms (Form 727) do not record the purging of the line before service abandonment of Building 115.

Corrective Action:

Provide the updated Form 727 that lists the purging information.

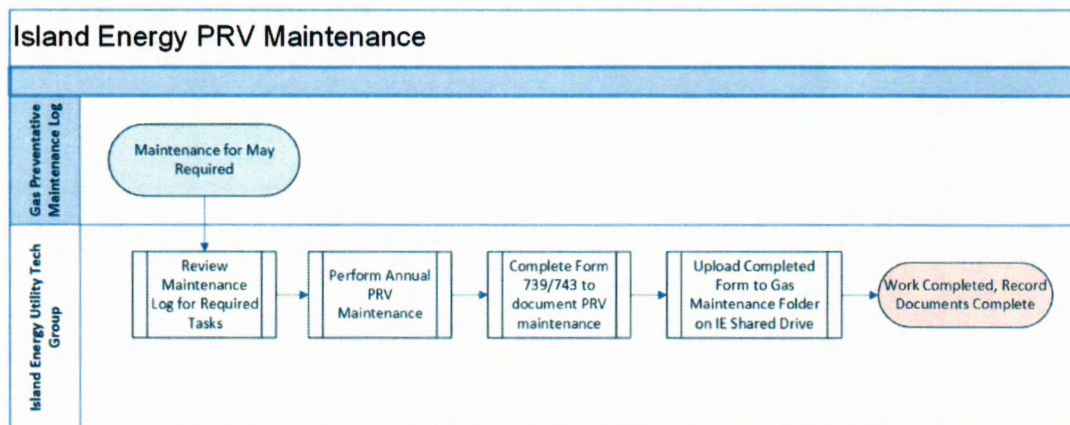
Response: Attached as Exhibit C is the updated Form 727 to include purging information.

- 3) Missing the 2017 Maintenance Record for the pressure relief valve (PRV).

Corrective Actions:

- Provide the missing 2017 PRV maintenance record, or
- Provide a process for the prevention of missing PRV maintenance (The Gas Monthly PM Log).

Response: To prevent future occurrences of missing PRV maintenance records, Island Energy has created a monthly calendar with recurring tasks laid out. See below for the May Calendar month, which includes "Form 739: Pressure Relief Valve Maintenance Record". When the form is completed, the file is scanned and digitally uploaded to a dedicated Gas Maintenance folder in the Island Energy system.



GAS PREVENTATIVE MAINTENANCE LOG

May	External Corrosion Control Rectifier Inspection Form 465-A	Facility Fencing - Vault Inspection Record Form 721	Facility Patrolling Record Form 721	Odorous Sampling Customer Sniff Test Record Form 625	Review and update O&M Manual	Review and update OQ Plan	Plastic Pipe Report
Atmospheric Corrosion Inspection Form 481	Cathodic Protection Survey Form IE-CP	Continuing Surveillance Form 613	External Corrosion Control Monitoring Form 465	Gas Leak Survey No Form	Office of Pipeline Safety Report No Form	PRV Inspection and Maintenance Form 739	Regulator Inspection and Maintenance Form 743
							Public Awareness Program Records Public Awareness Program Record: Customers Form 616

P/M list

Issued:
Due:
Issued To: Scott Silver

Comment: _____

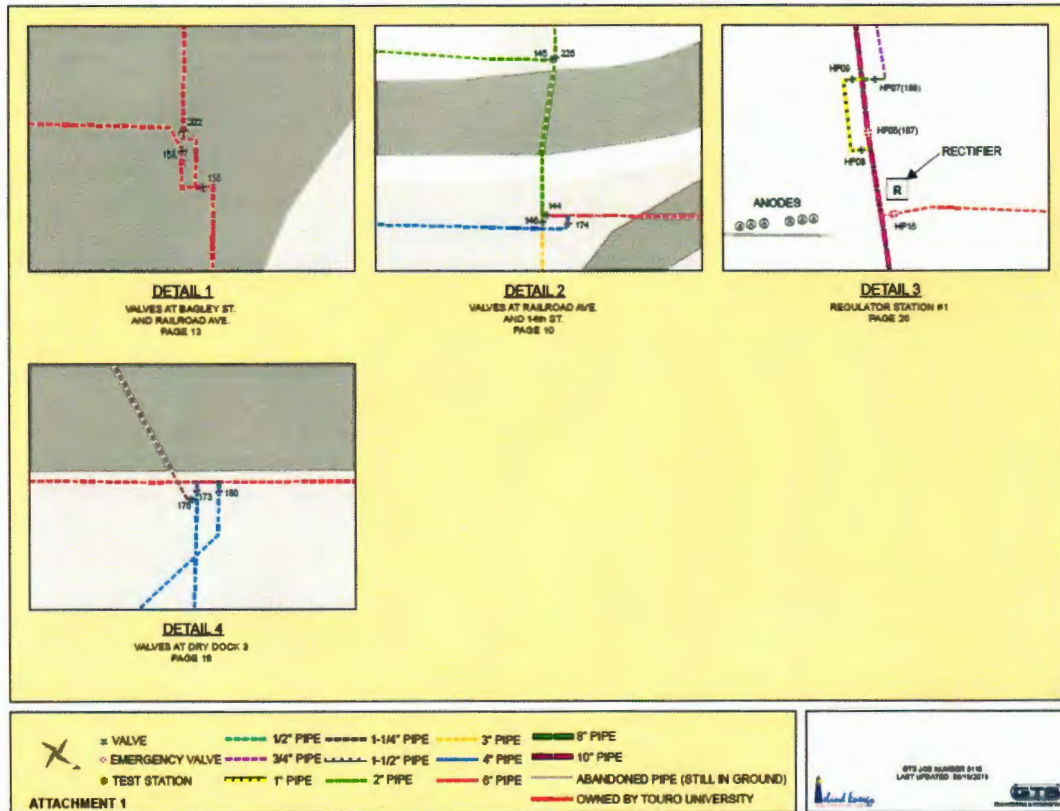
Problems Found: _____

4) IE System Maps do not show the location of rectifiers or anodes.

Corrective Actions:

- i) Update Map
- ii) Provide the map with the rectifier and the anode

Response: Below is a screen shot of the updated System Map book "Attachment 1" detailing the rectifier and anode locations in "Detail 3". The anodes are also marked in the field.

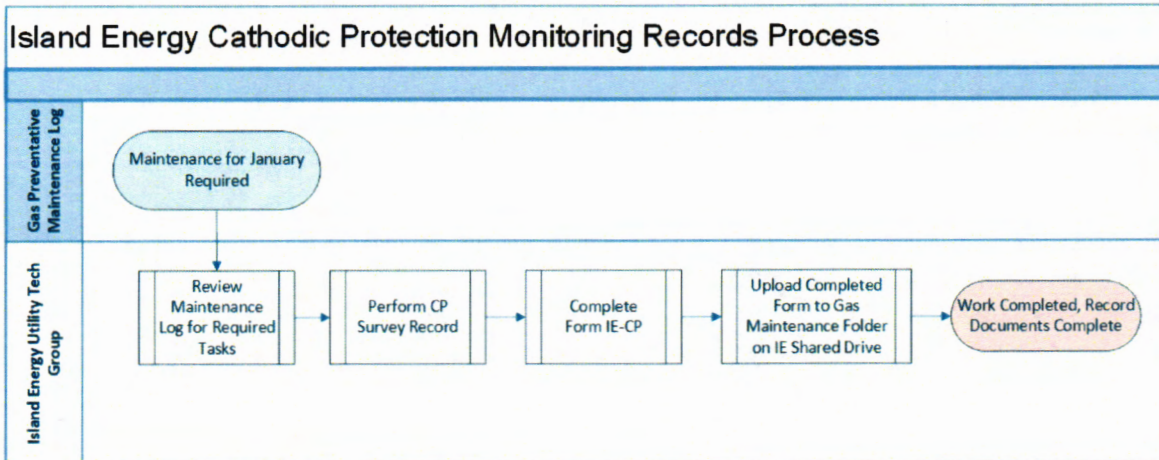


5) Missing 2018 cathodic protection monitoring records for the system.

Corrective Actions:

- i) Provide the missing 2018 cathodic protection records, or
- ii) Provide a process for the prevention of missing another cathodic protection monitoring record (The Gas Monthly PM Log)

Response: To prevent future occurrences of missing cathodic protection monitoring records for the system, Island Energy created a monthly calendar with recurring tasks laid out. See below for the January Calendar and Form IE-CP. Once the form is completed, the file will be scanned and digitally uploaded to a dedicated Gas Maintenance folder in the Island Energy system.



GAS PREVENTATIVE MAINTENANCE LOG

+ January	External Corrosion Control Rectifier Inspection Form 465-A	Odorant Sampling Customer Saiff Test Record Form 625	Plastic Pipe Report	

P/M list

Issued:

Due:

Issued To: Scott Silver

Comment: _____

Problems Found: _____

☐ Approved ☐ Deferred/Reason _____

☐ SRO Required SRO# _____

Supervisors Signature: _____ Date: _____

General Managers Signature: _____ Date: _____

We trust that the above is a satisfactory response to the Department of Transportation's subject gas system audit of Island Energy. Should you have any questions or require additional information, please advise. My contact information follows below.

Sincerely,

Douglas W. Buchanan, PE
Power Company Manager

CONTACT INFORMATION:

Douglas W. Buchanan, PE
Power Company Manager
Pittsburg Power Company – Island Energy
995 Walnut Ave.
Vallejo, CA 94592

(925) 252-4185 o

(925) 596-0527 c

Email: dougbuchanan@ci.pittsburg.ca.us

EXHIBIT A



Procedural Manual for Operations, Maintenance and Emergencies

Sub Part I - Operations	Approval Date:
Revision date: 9/11/19	Supersedes: All previous date's

Emergency Plan

Notification Record, Form 615-3 in this procedure for Federal reporting requirements.

PHMSA requires that any release of gas involving one or more of the following consequences:

1. Human death or inpatient hospitalization; or
2. Estimated property damage of \$50,000.00, including loss to the operator or others, or both, but excluding cost of gas lost; or
3. Unintentional estimated gas loss of three million cubic feet or more; or
4. An event that is significant, in the judgment of the operator, even though it did not meet the above criteria; be reported under the provisions of 49 CFR §191.5, §191.9 and §191.15.

The General Manager, or his/her designee, will submit the following incident notifications/reports:

Emergency scenarios that meet the definition of "incident" under 49 CFR §191.3 (1) (ii) will be telephonically reported to PHMSA under the requirements of 49 CFR §192.5, §191.9 and §191.15.

The following information will be required for telephonically reporting an incident to Federal authorities:

1. Name and telephone number of the individual reporting the incident.
2. The location of the incident (street address, city, county, state)
3. Date of the incident
4. Estimated or actual time of the incident
5. The number of injured persons and/or fatalities involved, as applicable
6. Type and extent of property damage, as applicable
7. Description of the incident

Telephonic reports of incident must be made at the earliest practicable moment after discovery but generally within one hour, (1 Hr.), after discovery.

Written distribution system incident reports will be submitted using PHMSA Form RSPA F 7100.1 as soon as practicable but not more than thirty, (30), days after detection of an *incident* required to be reported telephonically, as stated above.

Should additional relevant information pertaining to a distribution system *incident*, as described above, become available after submittal of the required written report, Island Energy will submit a supplemental report, as deemed necessary, clearly referencing the original written report by date and subject.

Form 615-3 can be used to facilitate written reports as described above.

RELATED CODE PROCEDURES

Sub Part I – Requirements for Corrosion Control

Sub Part L - Operations

Sub Part M - Maintenance

Prepared by: HIT-KIT, LLC ©2007-2010 All Rights Reserved
Revised by: Island Energy 2011 - 2017



Subject: Gas Distribution System O&M Manual
Public Awareness
Natural Gas Safety Mailing List

Revision: 11 September 2019

Natural Gas Safety Mailing List

Emergency Services Personnel:

Thomas Ferrara, Sheriff/Coroner
Solano County Sheriff's Office
530 Union Avenue, Suite 100
Fairfield, CA 94533

Andrew Bidou, Chief of Police
Vallejo Police Department
111 Amador Street
Vallejo, CA 904590

California Highway Patrol
Golden Gate Division
3050 Travis Boulevard
Fairfield, CA 94534

Daryl Arbuthnott, Fire Chief
Vallejo Fire Department
970 Nimitz Avenue
Vallejo, CA 94592

Public Schools

Dr. Adam Clark
Vallejo Unified School District
665 Walnut Avenue
Vallejo, CA 94592

Mare Island Fitness & Health Academy, Principal
665 Walnut Avenue
Vallejo, CA 94592

Natural Gas Safety Mailing List (Cont.)

Dr. Adam Clark, Superintendent of Schools
Vallejo Unified School District
665 Walnut Avenue
Vallejo, CA 94592

Public Officials

Greg Nyhoff, City Manager
555 Santa Clara Street
Vallejo, CA 94592

Steve Arnold
City of Vallejo Chief Building Official
555 Santa Clara Street
Vallejo, CA 94590

Terrance Davis
City of Vallejo Public Works Director
555 Santa Clara Street
Vallejo, CA 94590

Lieutenant Kenny Park
City of Vallejo Code Enforcement Manager
Two Florida Street
Vallejo, CA 94590

The Honorable Bob Sampayan
Mayor of the City of Vallejo
555 Santa Clara Street
Vallejo, CA 94590

Afshan Hamid
City of Vallejo Planning Manager
555 Santa Clara Street
Vallejo, Ca 94590

Erin Hanford
Mare Island Project Manager
555 Santa Clara Street
Vallejo, CA 94592



Procedural Manual for Operations, Maintenance and Emergencies

Form 727	Approval; Date:
Revision date: 9/11/19	Supersedes: None

Facility Abandonment/Removal Record

Address/location: _____

PURGE:

Purge Location: _____

Start and End Time: ____:____ - ____:____ Duration of Purge: _____

MAIN:

Abandonment ☐ Removal ☐

Type _____ Pipe Diam. _____ ft. _____ in. _____

Miles of Main in System prior to Removal _____

Miles of Main in System following Removal _____

SERVICE LINE:

Abandonment ☐ Removal ☐

Type _____ Pipe Diam. _____ ft. _____ in. _____

Number of Service Lines in System prior to Removal _____

Number of Service Lines in System following Removal _____

REMOVAL AUTHORIZED BY:

OWNER ☐

GENERAL MANAGER ☐

BUILDING INSPECTOR ☐

CONTRACTOR ☐

OTHER (Name Below) ☐

CONDITION OF MAIN/SERVICE LINE:

EXCELLENT ☐

GOOD ☐

FAIR ☐

POOR ☐

CATHODICALLY PROTECTED ☐

BARE PIPE ☐

DATE OF REMOVAL: ____/____/____

BY: _____