

Attachment A

Post-Inspection Written Preliminary Findings

Date of Transmittal: 05/18/2023

Dates of Inspection: Mar 20-24, 2023

Operator: SOUTHERN CALIFORNIA EDISON CO

Operator ID: 18480 (primary)

Inspection Systems: SCE LPG Distribution System at Avalon, Catalina Island

Assets (Unit IDs) with results in this report: Catalina Island (87037)

System Type: GD

Inspection Name: SCE Catalina LPG System - Avalon

Lead Inspector: Randy Holter

Operator Representative: Traci Degnan – SCE Catalina LPG Compliance Advisor

Unsatisfactory Results:

No Preliminary Findings.

Concerns:

Procedures: Damage Prevention Program (PRO.SUBLDAMAGEPREVENT)

1. Question Title, Documented Damage Prevention Program – TPD, PD.DP.TPD.P ID

Question 4. Does the process specify how reports of Third-Party Activity and names of associated contractors or excavators are input back into the mail-outs and communications with excavators along the system?

References 192.614(c)(1)

Assets Covered Catalina Island (87037 (70))

Issue Summary SED reviewed SCE Catalina LPG's Standard Procedure (SP)-430, Section 9.0 that states in part:

“SCE will maintain a list of excavators performing routine excavation activities within the SCE Catalina operating territory. SCE will update the list by obtaining the ticket requests from Dig Alert from the previous

2 years. SCE will review use this information to identify new active excavators and remove those who are no longer performing excavation activities on Catalina Island. This list of excavators will be included in our annual Dig Alert Contractor Safety Awareness Seminar.”

Title 49 CFR, Part 192, §192.614(c)(1) and §192.614(c)(1) states:

- “(1) Include the identity, on a current basis, of persons who normally engage in excavation activities in the area in which the pipeline is located.*
- (2) Provides for notification of the public in the vicinity of the pipeline and actual notification of the persons identified in paragraph (c)(1) of this section of the following as often as needed to make them aware of the damage prevention program:*
- (i) The program's existence and purpose; and*
 - (ii) How to learn the location of underground pipelines before excavation activities are begun.”*

California Government Code (CGC), §4216.2(f) states in part:

“A record of all notifications by an excavator or operator to the regional notification center shall be maintained for a period of not less than three years.”

SED recommends SCE Catalina LPG maintain a record of all notifications by an excavator or operator to the regional notification for a period of not less than three years (instead of two).”

On May 3, 2023, 2023, with an email, SCE Catalina LPG provided SED with the following response:

“SCE Catalina LPG has updated SP-430, Section 9.0 – Annual Update of Dig Alert Information, to obtain the ticket request for Dig Alert from the previous 3 years instead of 2 years to ensure SCE includes all potential excavators in the area, even if they are not frequent excavators in the distribution area.

SED accepts the SCE Catalina LPG’s written and implemented corrective action. Therefore, no further response is needed by SCE Catalina LPG. Please be advised, SED may review SCE Catalina LPG’s corrective action during future inspections.

Procedures: Emergency (PRO.SUBLEMERGOPS)

2. Question Title, Incident Investigation Actions, EP.ERG.INCIDENTACTIONS.P ID

Question 11. Does the process include procedures for beginning action under 192.617, if applicable, as soon after the end of the emergency as possible?

References 192.615(a) (192.615(a)(10))
Assets Covered Catalina Island (87037 (70))
Issue Summary SED reviewed SCE Catalina LPG's Emergency Response Plan, Section 2.19 Training and Post-Incident Review section states in part:

“SCE Catalina LPG gas utility staff should conduct an After-Action Review (AAR) of significant incidents and responses with an emphasis on response methods, strategies, management, and related information with the intent on strengthening team capability and performance. This process is outlined in Standard Procedure 415 Accident and Failure Investigation of SCE's Catalina Gas Operations and Maintenance Manual.”

SED also reviewed the SCE Catalina LPG's SP-415 Accident and Failure Investigation.

Title 49 CFR, Part 192, §192.617 Investigation of failures.

“Each operator shall establish procedures for analyzing accidents and failures, including the selection of samples of the failed facility or equipment for laboratory examination, where appropriate, for the purpose of determining the causes of the failure and minimizing the possibility of a recurrence.”

Title 49 CFR, Part 192, §192.615 (a) states in part:

“Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:

(10) Beginning action under § 192.617, if applicable, as soon after the end of the emergency as possible.”

SCE Catalina LPG's Attachment 415-A Failure Investigation/Follow-up after Emergency form, page 1 of 9 does not specify its terms for “...as soon after the end of the emergency as possible.”

To clarify SCE Catalina LPG's Attachment 415-A, definition, and expectations for “Beginning action under § 192.617...”, SED recommends that SCE Catalina LPG's provide procedures for establishing “End of Emergency, and/or Site Made Safe” definitions, and add expected “Beginning Action” timeline to Form 415-A.

SCE Response:

SCE updated Standard Procedure 415 – Accident and Failure Investigation, Section 1.0 Key Definitions to include definitions for “Site Made Safe/End of Emergency” and “Specimen”

Section 3.0 – After-Action Review (AAR) has been updated to include verbiage that states an AAR will be conducted as soon after the emergency as possible for analyzing accidents and failures. Section 3.1 has been added to include Investigation of Failure and Incident Procedure, including Response to Failure, Data Collection, Investigation, Specimen Collection and Testing and Analysis.

Attachment 415-A has been reformatted to the changes made to Section 3.1 and to include a “Beginning Action Timeline”

Attachment SP-415 – Accident and Failure Investigation

Procedures: Odorization of Gas (PRO.SUBLODOR)

3. Question Title, Odorization of Gas, MO.GOODOR.ODORIZE.P ID

Question 1. Does the process ensure appropriate odorant levels are contained in its combustible gases in accordance with 192.625?

References 192.605(b)(1) (192.625(a), 192.625(b), 192.625(c), 192.625(d), 192.625(e), 192.625(f))

Assets Covered Catalina Island (87037 (70))

Issue Summary SED reviewed SCE Catalina LPG's SP- 409, which outlines the activities performed to ensure that the propane in the petroleum gas pipeline distribution system contains the proper concentration of odorant.

Title 49 CFR, Part192, § 192.625 states in part:

“(c) In the concentrations in which it is used, the odorant in combustible gases must comply with the following:

(1) The odorant may not be deleterious to persons, materials, or pipe.

(2) The products of combustion from the odorant may not be toxic when breathed nor may they be corrosive or harmful to those materials to which the products of combustion will be exposed.”

SED noted that SCE Catalina LPG currently does not have any process in its procedures to ensure the odorant in its system is not deleterious to persons, materials, or pipe. SCE Catalina LPG’s team explained that it receives already odorized propane from its propane supplier(s). SED recommends SCE Catalina LPG establish a process to ensure *the odorant is not deleterious to persons, materials, or pipe.*

On May 3 and May 4, 2023, SCE Catalina LPG provided the following responses via email:

- 1. Revised its procedure SP-409 to require receiving written verification from their gas source that the gas has the proper odorant and*

2. *Conducting periodic sampling of combustible gases using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable.*

SED accepts the remedial actions taken by SCE Catalina LPG. Therefore, no further response is needed by SCE Catalina LPG. Please be advised, SED may review SCE Catalina LPG's corrective action during future inspections.

Records: Operations and Maintenance (PRR.OM)

4. Question Title, Odorization of Gas, MO.GOODOR.ODORIZE.R
ID

Question 16. Do records indicate appropriate odorization of its combustible gases in accordance with its processes and conduct of the required testing to verify odorant levels met requirements?

References 192.709(c) (192.625(a), 192.625(b), 192.625(c), 192.625(d), 192.625(e), 192.625(f))

Assets Covered Catalina Island (87037 (70))

Issue Summary SCE Catalina LPG's SP- 409 - Monitoring and Verification of Petroleum Gas Odorization (Revised April 2023), Section 4.0 Propane Odorization Program states in part:

“According to federal regulations, the odor must be readily detectable when the propane concentration in air is at 0.42% (one-fifth LEL) or less. The LEL of propane in air is 2.1%....”

SED reviewed SCE Catalina LPG's odorant test records for 2019 through 2022. In its 5/12/2022 test record for Bird Park Road test station, SCE Catalina LPG's crew reported odorant level in the gas to be 19%. In a similar test record on 9/15/22, SCE reported an odorant level of 20%. SCE Catalina LPG's management stated that these numbers were meant to be 0.19% and 0.20% respectively; the crews made data input errors.

SED recommends SCE Catalina LPG ensure its crews understand the requirement of odorant level in the gas so that at a concentration in air of one-fifth of the lower explosive limit, the gas is readily detectable by a person with a normal sense of smell as required by 49 CFR §192.625 (a) and ensure accurate recording on the inspection forms.

In addition, SP 409, Section 4.0 states, in part:

“Using a portable odor concentration analyzer, the coordinator will conduct quarterly sampling to confirm that the propane is readily detectable by smell at this concentration.”

In SED's review of 2020 test record for SCE Catalina LPG's Bird Park Road test station, SED noted that SCE Catalina LPG crew conducted an odorant test on 4/17/2020 and subsequent inspection on 9/22/2020, more than 5 months later. Similarly, in 2021, SCE crew conducted a test on

4/5/2021 and conducted a subsequent test on 9/2/2021. SED recommends SCE Catalina LPG revise its procedures to include a time interval tolerance (e.g. *intervals not exceeding 4 ½ months, but at least four times each calendar year*) to ensure that it is conducting the quarterly odorant tests at more consistent intervals.

SCE Response:

SCE conducted a training session with gas personnel on 5/3/23 to discuss the Odorator Inspection Form and to ensure operators understood the requirement of odorant level in the gas so that at a concentration in air of one-fifth of the lower explosive limit, the gas is readily detectable by a person with a normal sense of smell. Also discussed the proper data logging of the readings with understanding as to the decimal point and the importance of what it means and what actions to take when there is an abnormal reading.

Although there is no specific timeframe requirement for performing the odorant tests, i.e. Title 49 192.625 (f) (2) - *Conducting periodic "sniff" tests at the extremities of the system to confirm that the gas contains odorant*, SCE will continue to perform odorant tests on a frequent interval, not to exceed 4 ½ months, but at least 4 times a year.

To ensure the odorant testing does not exceed the 4 ½ month timeframe, SCE will set up a notification system via SAP and EHSync to remind crews when this item is due and will require a formal close out of the item with the date it was performed.

4.0 Propane Odorization Program

According to federal regulations, the odor must be readily detectable when the propane concentration in air is at 0.42% (one-fifth LEL) or less. The LEL of propane in air is 2.1%. Using a portable odor concentration analyzer, the coordinator will conduct sampling in intervals not exceeding 4 ½ months, but at least four times each calendar year to confirm that the propane is readily detectable by smell at this concentration. The results of the field sampling shall be recorded on the Field Odor Verification Form as presented in Attachment 409-B.

Attachment: Training Roster 5/3/23

Attachment: SP-409