



PG&E “Waiver” at proposed Tracy Sports Park

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PG&E's Landuse Philosophy

- Neutral about landuse around pipelines, as long as mitigation efforts are in place to address threats
- Need to ensure sufficient pipeline access for maintenance and construction
- Coordination with public officials and developers improves public safety through the implementation of threat mitigation in the design of the development
- Demand and need for land is high; so safe, joint use is important

PG&E's Perspective

Tracy Sports Park

- Opportunity to support OPS' efforts to promote alternative risk reduction efforts with equivalent or enhanced safety for class location changes
- The impacted PG&E pipeline is one of the newest pipelines in the system and was the best candidate for alternative efforts
- The alternative efforts would:
 - address all threats on L-401 and a parallel, older “in-class” pipeline,
 - ensure third party damage didn't not occur during construction and
 - would enhance maintenance practices and pipeline safety communications to ensure long-term threat mitigation.

Alternative Threat Mitigation Tracy Sports Park

Threat	Mitigation	"Alternative" Frequency	Existing Code Requirements
External Corrosion	1. In-line inspection of both pipelines 2. Increased rectifier and P/S reads 3. Direct assessment of cathodic protection	1. Every 7 years - Starting '06 2. Bi-monthly 3. One time	1. 7-10 years after construction 2. Bi-monthly and annual 3. Not required
Internal Corrosion	In-line inspection of both pipelines	Every 7 years - Starting '06	7-10 years after construction
Third Party Damage	1. In-line inspection of both pipelines 2. Temporary fencing of R/W 3. Direct assessment of coating condition 4. Safety Training for all contractor employees 5. Standby during construction in easement 6. "Check in" with contractors 7. Pipeline patrols 8. Increased pipeline marking 9. Coordination of R/W landuse (parking) 10. Community education flyer	1. Every 7 years - Starting '06 2. During construction 3. One time 4. One time 5. During construction 6. Daily 7. Monthly 8. Along parking strip 9. n/a 10. One time	Replace newest pipeline w/thicker pipe 1. 7-10 years after construction 2. Not required 3. Not required 4. Not required 5. Not required 6. Not required 7. Annual 8. Not required 9. Not required 10. Not required
Ground Movement	No slope instability or high ground acceleration concerns	n/a	n/a
Stress Corrosion Cracking	Magnetic particle inspection during direct assessment examinations	One time	None
Manufacturing	Not a concern because both pipelines were manufactured with modern techniques and quality standards	n/a	n/a
Construction (initial)	Not a concern because both pipelines are modern construction with post-construction pressure tests	n/a	n/a
Equipment	None present in the Sports Park	n/a	n/a
Cyclic Fatigue	Minimal pressure variations and frequency make this threat stable	n/a	n/a
Operator Error	Ensure personnel are trained and qualified to perform tasks	System-wide Operator Qualification program	System-wide Operator Qualification program

Lessons Learned

- Local authorities need a trusted, neutral authority with the technical ability to competently “weigh” risk reduction efforts...PHMSA’s role. They do not have the expertise to determine if risk reduction efforts are sufficient.
- During public comment period ensure the public has full opportunity to present its concerns and that these concerns are fully discussed.
- Ensure that public communications are completely "transparent". Our public presentation to the City Council mentioned a "Safety Plan" not a "waiver." Like PHMSA’s use of “Special Permit”, PG&E was communicating that the requirements for additional safety in Class 3 locations weren’t “waived” but that an alternative “safety plan” was approved in lieu of existing requirements.
- Ensure that all "waiver" conditions are clearly understood by all parties involved in implementation and regulatory oversight. In this case, the obligations imposed by the CPUC resolution were triggered if there was "construction" at the site. In practice, however, the term "construction" did not mean the same thing to all parties. This confusion left the City of Tracy with an interpretation that site preparation activities, in advance of actually pouring concrete or erecting structures, were not covered by the conditions.

Additional info

- **Line 401**

36 inch line, installed in 1993, operates at 1040 psig

- **Line 002**

26 inch line, installed in 1972, operates at 890 psig

- No anomalies in the Tracy Sports Park exceeded 21% of depth or 3.5" in length and none were a concern per sub-part O
- L-002 has double wrapped tape and it is in good condition. No damage to the wrap was found by DA
- Both pipelines are more than 5' deep throughout the Sports Park
- CP reads are excellent throughout the Sports Park
- No CP interference is occurring in the Sports Park. This problem is occurring 50 miles south