

June 25, 2019

Supervisor John Gioia, District 1
Contra Costa County Board of Supervisors
11780 San Pablo Avenue, Suite D
El Cerrito, CA 94530

Re: Pipeline Safety Recommendations

Dear Supervisor Gioia:

I am writing on behalf of the Contra Costa County Hazardous Materials Commission to recommend the Board of Supervisors take following actions to promote pipeline safety in Contra Costa County. These recommendations were voted on at the May 23, 2019 Commission meeting after careful review and deliberation of recommendations in a 2018 report by the Pipeline Safety Trust on pipeline safety in Contra Costa County. All recommendations were approved by a vote of 10 - 0 with the exception of recommendation number 4, which was opposed by the representative of the Industrial Association, Mark Hughes. This report was done on behalf of the Alamo Improvement Association as part of a grant they received from the Federal Department of Transportation. This report focused on gas pipeline safety issues, and was done as a follow-up to a previous report in 2015 that focused on liquid pipeline safety issues.

- 1) Recommend to the Pipeline and Hazardous Materials Safety Administration (PHMSA) that they include enforcement actions against operators by state pipeline safety regulators and the U.S Department of Justice on their webpage.

The PHMSA web page currently only includes PHMSA pipeline safety enforcement actions which doesn't give a full and transparent understanding of the enforcement status of an operator. For example, the enforcement status for PGE on the PHMSA website shows no federal enforcement actions since 2006. This does not include the fact that PGE was convicted

of federal felony criminal violations by the Department of Justice for the 2010 San Bruno incident.

- 2) Recommend to PHMSA, the Office of the State Fire Marshal and the California Public Utilities Commission that they make information about a pipeline's High Consequence Area (HCA) designation easily available to the public.

Hazardous Liquid pipelines that could affect HCAs, which include high population areas, certain drinking water sources, or some ecologically sensitive areas, must prepare integrity management plans and adhere to stricter assessment rules than pipelines that could not affect an HCA in the event of a failure. Information about which pipeline segments are, and are not, within HCAs is not easily available to the public.

- 3) Support federal legislation that improves leak detection systems in pipelines.

PHMSA has been working on a rule-making process for seven years to address the findings of a 2013 study on the technical limitations of current leak detection systems, but no new or proposed rules have been release for public review.

- 4) Support federal legislation that requires pipeline operators to contract for an independent technical seismic vulnerability study on HCA pipelines affected by potentially active faults to feed into the pipeline risk analysis, and make the study available to the public.

The Alamo Improvement Association contracted with a private engineering firm to conduct seismic review report of the pipelines in the Alamo area which yielded recommendations about how to address current potential vulnerabilities.

- 5) Recommend to the California Department of Education that they complete their review of school siting and design standards review that was begun in 2016 and that they implement the recommendations the Commission made previously.

In January, 2018 the Commission recommended the Board of Supervisors recommend to the California Department of Education that they amend the regulations pertaining to the rebuilding of schools on the site of existing schools to require that the current risks from accidental explosions and fire of hazardous materials used, stored, manufactured or transported at industrial facilities, in pipelines and by rail be assessed and mitigated. The review begun in 2016 has stalled out, and there is no current effort underway to complete the review.

- 6) Recommend to the California Department of Education, local community colleges, and local School Districts that they use the enclosed brochure or other, similar brochure to encourage schools to address pipeline incidents in their emergency response plans, and encourage existing schools to mitigate the risks from nearby pipelines utilizing the state guidelines that have been developed for siting new schools.

The County Hazardous Materials Program and Public Works Department, the Contra Costa CAER group, the Contra Costa County Fire District and the San Ramon Valley Fire District developed the enclosed brochure to be used by schools, daycare centers, Senior Centers, medical facilities and other “Sensitive Receptors” to educate them about pipeline safety issues and the need to address potential pipeline incidents in their Emergency Response Plans.

- 7) Recommend to pipeline operators that they reach out to the schools along their pipeline easements and offer to provide technical assistance assessing pipeline risks and evacuation strategies. Offer to provide them the County brochure on pipeline safety and emergency planning if they don't already have appropriate educational materials.

The County Hazardous Materials Program and Public Works Department, the Contra Costa CAER group, the Contra Costa County Fire District and the San Ramon Valley Fire District developed the enclosed brochure to be used by schools, daycare centers, Senior Centers, medical facilities and other “Sensitive Receptors” to educate them about pipeline safety issues and the need to address potential pipeline incidents in their Emergency Response Plans.

Sincerely,

George Smith
Chairperson, Hazardous Materials Commission