



Contra Costa County
Public Works
D e p a r t m e n t

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Deputy Directors

Brian M. Balbas

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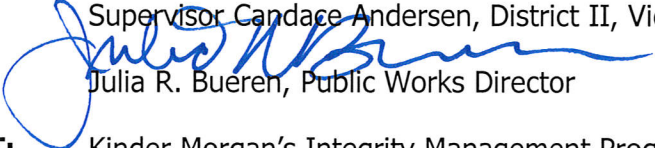
Stephen Silveira

Joe Yee

Memo

DATE: January 28, 2014

TO: Supervisor Mary N. Piepho, District III, Chair
Supervisor Candace Andersen, District II, Vice Chair

FROM:  Julia R. Bueren, Public Works Director

SUBJECT: Kinder Morgan's Integrity Management Program

Recommendation:

Receive report regarding Kinder Morgan's Integrity Management Program (IMP) and forward to the Board of Supervisors for consideration and approval to send a letter to the State Fire Marshal requesting a review of the IMP for the Kinder Morgan pipeline in Central and South Contra Costa County.

Financial Impact:

There is no impact to the County General Fund.

Report Background:

In February 2013, Supervisor Andersen requested that the Hazardous Materials Commission provide input on whether the Kinder Morgan pipeline running parallel to the Iron Horse Trail through Central Contra Costa County contains the adequate number of valves and the right type of valves to protect nearby communities in the event of a spill or explosion. A concern was raised by nearby residents as a result of the role inadequate valves played in the San Bruno PG&E pipeline explosion.

In response to this request, Michael Kent, Executive Assistant to the Hazardous Material Commission in coordination with the Hazardous Materials Commission collected the following information:

The Kinder Morgan Pipeline is governed by federal regulations found in 49CFR 195 enforced by the Pipeline and Hazardous Materials Safety Administration (PHMSA) which is part of the Federal Department of Transportation. The relevant section of CFR195 is section 452, which governs pipeline integrity management in high consequence areas. The Kinder Morgan pipeline is located is considered a high consequence area.

This section states, in part, (Sec 195.452 (i)):

An operator must take measures to prevent and mitigate the consequences of a pipeline failure that could affect a high consequence area. These measures include conducting a risk analysis of the pipeline segment to identify additional actions to enhance public safety or environmental protection. Such actions may include, but are not limited to, implementing damage prevention best practices, better monitoring of cathodic protection where corrosion is a concern, establishing shorter inspection intervals, installing EFRDs (emergency flow restriction devices) on the pipeline segment, modifying the systems that monitor pressure and detect leaks, providing additional training to personnel on response procedures, conducting drills with local emergency responders and adopting other management controls.

The Commission tried to ascertain whether such an analysis had been done on this segment of the Kinder Morgan pipeline, and the results and evaluation of that analysis, by contacting Kinder Morgan, PHMSA and the State Fire Marshal. The State Fire Marshal shares regulatory oversight of this Pipeline with PHMSA because it is an interstate pipeline.

In a telephone conference call with PHMSA and the State Fire Marshal on October 10, 2013, Michael Kent learned that there has been a consent agreement with Kinder Morgan since 2005 for the whole Western Region governing their Integrity Management Program (IMP). In 2006 Kinder Morgan's Integrity Management Program was reviewed by PHMSA and the State Fire Marshal. They didn't look at the results for this specific pipeline, but at Kinder Morgan's overall procedure for conducting their IMP, which they found adequate. They completed another review of Kinder Morgan's pipelines in the Western Region this year, but again didn't look at the IMP for this section of pipeline specifically. They did perform a physical inspection.

At the end of the conversation, the representative from the State Fire Marshal's office said that County can request that the State Fire Marshal's review the IMP for this section of the pipeline, but it would depend on their workload, priorities, and the demand for such an analysis.

This information was shared with the Alamo Municipal Advisory Council on January 7, 2014. The Council requested that staff move forward on this. Supervisor Andersen has also expressed her support for this request to go to the State Fire Marshal.

Consequences of Negative Action:

The State Fire Marshal may not perform a review of Kinder Morgan's IMP for the section of pipeline that runs through County Costa County.

Please feel free to contact Carrie Ricci at 313-2235 with any additional questions.

JRB:CR:mw

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Enclosure

c: Michael Kent, Health Services

County Administrator

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David J. Twa
County Administrator

Contra Costa County



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February [], 2014

Bob Gorham, Division Chief
CAL FIRE
Office of the State Fire Marshal
Pipeline Safety Division
3950 Paramount Blvd., #210
Lakewood, CA 90712

RE: Integrity Management Program Review of Kinder Morgan Pipeline

Dear Chief Gorham:

After the 2010 PG&E gas pipeline explosion and fire in San Bruno, many residents in Central Contra Costa County that live near the Kinder Morgan pipeline running parallel to the Iron Horse Trail have expressed concern about the safety of that pipeline. We understand that your agency shares the responsibility of overseeing the safety of this pipeline with the Federal Department of Transportation, and that a satisfactory physical review of this pipeline was conducted in 2012. However, we also understand that the integrity management risk analysis required by Federal pipeline regulations that was conducted by Kinder Morgan on this segment of pipeline has not been reviewed by your office or the Federal Department of Transportation.

Therefore, we are writing to request that before the next full review of this pipeline your office review the integrity management risk analysis that was done on this segment of the pipeline by Kinder Morgan, determine if it was adequately done, and determine if Kinder Morgan completely implemented all the recommendations resulting from that analysis. Specifically, we request that your agency review the integrity management risk analysis that was conducted by Kinder Morgan required by 49CFR195.452(i) on line section 16 of Fire Marshal line # 0277 that runs through Central and South Contra Costa County parallel to the Iron Horse Trail in the Iron Horse Corridor.

We request that you share the results of this analysis at the County Board of Supervisors Transportation, Water and Infrastructure Committee Meeting. The committee meets monthly. Please contact Carrie Ricci at (925) 313-2235 if you have any questions. She can also schedule you or your staff to attend a future committee meeting.

Should you have any questions, please contact me at (925) 521-7100.

Sincerely,

Karen Mitchoff
Chair, Board of Supervisors