

**STATE OF NEW YORK DEPARTMENT OF PUBLIC SERVICE**  
**90 CHURCH STREET, NEW YORK, NY 10007-2919**  
www.dps.state.ny.us



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*General Counsel*

**JACLYN A. BRILLING**  
*Secretary*

June 21, 2010

Ms. Katherine Boden  
Vice President – Gas Operations  
Consolidated Edison of New York, Inc.  
4 Irving Place – Room 1624  
New York, NY 10003

Dear Ms. Boden:

Enclosed for your review are the final 2010 record audit reports prepared by staff of the New York State Department of Public Service, Office of Electric, Gas & Water. The reports, which encompass the Central, Queens, Westchester, Bronx, and Manhattan operating areas, are specific in outlining instances of non-compliance where Con Edison failed to adhere to the requirements of 16 NYCRR 255 – Transmission and Distribution of Gas and 16 NYCRR 261 – Piping Beyond the Meter.

Please note that staff's audits were based on a sample review of pertinent operation and maintenance records, and findings were discussed during subsequent meetings with Con Edison management.

Please respond by July 23, 2010 detailing what actions have and/or will be taken by Con Edison to remediate noted violations and insure future compliance. If you have any questions regarding these or any other gas safety concerns, please do not hesitate to call my office at ( )

Sincerely,

Carlos Ortiz  
Utility Engineer 3 – NYC  
Office of Electric, Gas & Water – Safety Section

cc: Joseph F. Klesin – DPS  
D. Davidowitz  
E. Olson  
T. Bavuso  
L. Singh  
L. Gonzalez  
J. Thaker

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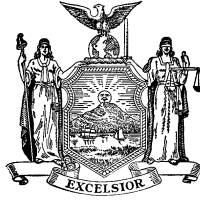
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Carlos Ortiz  
Utility Engineer 3 – NYC  
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D. Davidowitz  
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T. Bavuso  
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L. Gonzalez  
J. Thaker



Katherine Boden  
Vice President  
Gas Operations

July 28, 2010

Mr. Carlos Ortiz, Utility Engineer  
State of New York, Department of Public Safety  
Office of Electric, Gas & Water – Safety Section  
90 Church Street, 4<sup>th</sup> Floor  
New York, N.Y. 10007-2919

Dear Mr. Ortiz:

Responding to your June 21, 2010 letter citing the result of Staff's 2010 record audits of Gas Operations, we acknowledge Staff's findings and concerns and assure you that we are committed to achieving full compliance in all areas. We will review the audit findings and the corrective actions with our employees. Thank you and your staff for bringing these matters to our attention and we look forward to working together to improve our operations.

Attached is our response to the specific findings and concerns.

Sincerely,

Katherine Boden

Cc: Claude Trahan  
Mario Smith  
Ed Foppiano

**Consolidated Edison of New York  
2010 Violation Specifics - Record Audit  
Bronx Gas Operations - OHQ**

Staff used a statistically based auditing approach to determine the number of records to be reviewed that would yield 95% confidence during the audit of the listed code mandated functions.

**Warning Tags**

**16 NYCRR 261.65(a) - Warning tag records - 1 Violation - 7 Occurrences**

**Class "A" warning tags:**

*1. 9.0: Class "A" Warning Condition*

*A class "A" condition presents an immediate hazard requiring the gas to be shut off & the meter locked unless the affected area can be effectively isolated from the rest of the gas system.*

a) 837 E 222<sup>nd</sup> St

Tag issued 4/13/2009

Leak in house piping. Neither the meter locked nor does the gas service shut off.

***Con Edison's Response***

***We accept this finding. While the customer's head of service valve was turned off and locked, and these actions were recorded within our Emergency Response System (ECS) for Leak Ticket XL09002623 they were not recorded on the Red Tag as required. We have reminded all appropriate Bronx personnel of the requirements in G-11837 and we have implemented a review of these tags to assure the information is complete.***

b) 3234 Spencer Dr

Tag issued 5/3/2009

Flame roll out at boiler. Gas service is shut off but meter is not either locked or capped.

***Con Edison's Response***

***We accept this finding. While the customer's faulty appliance was turned off, disconnected and plugged and these actions were recorded within our Emergency Response System (ECS) for Leak Ticket XL09003087, they were not recorded on the Red Tag as required. We have reminded all appropriate Bronx personnel of the requirements in G-11837 and we have implemented a review of these tags to assure the information is complete.***

**Class “B” Warning Tags:**

**10.0 Class “B”- Warning Conditions**

**10.1: A Class “B” condition presents an immediate hazard & requires the gas to be shut off but not locked isolated by disconnection.”**

a) 2205 Davidson Ave

Tag issued 5/27/09

Leak at flex hose. Warning Tag does not reflect any action taken by CENY

**Con Edison’s Response**

***We accept this finding. While the customer’s leaking flex hose was turned off, and this action was recorded within our Emergency Response System (ECS) for Leak Ticket XL09003619, it was not recorded on the Red Tag as required. Customer Operations has reviewed CE Specification G-11837 and the Requirements for Red Tag documentation with their employees. Customer Operations management will verify the information on the Red Tags is complete.***

b) 2716 Schruz Ave

Tag issued 4/20/2009

Delayed ignition for the oven burner. Warning Tag does not reflect any action taken by CENY

**Con Edison’s Response**

***We accept this finding. While the customer’s faulty appliance was turned off and this action was recorded within our Emergency Response System (ECS) for Leak Ticket XL09002768, it was not recorded on the Red Tag as required. We have reminded all appropriate Bronx personnel of the requirements in G-11837 and we have implemented a review of these tags to assure the information is complete.***

c) 1820 Harrison Ave

Tag issued 4/19/2009

Range fire. Warning Tag does not reflect any action taken by CENY

**Con Edison’s Response**

***We accept this finding. While the customer’s appliance valve was turned off by the New York City Fire Department and verified by Con Edison that the valve was holding, and these actions were recorded within our Emergency Response System (ECS) for Leak Ticket XG09003357, they were not recorded on the Red Tag as required. We have reminded all appropriate Bronx personnel of the requirements in G-11837 and we have implemented a review of these tags to assure the information is complete.***

d) 931 Cranford Ave.  
Tag issued 4/14/2009.  
Warning Tag does not reflect any action taken by CENY

**Con Edison's Response**

***We accept this finding. While the customer's appliance valve was turned off, and this action was recorded within our Emergency Response System (ECS) for Leak Ticket XL09003180 it was not recorded on the Red Tag as required. Customer Operations has reviewed CE Specification G-11837 and the Requirements for Red Tag documentation with their employees. Customer Operations management will verify that the information on the Red Tags is complete.***

e) 5535 Netherland Ave  
Tag issued 5/14/2009  
Leak at the flex hose. Warning Tag does not reflect any action taken by CENY

**Con Edison's Response**

***We accept this finding. While the customer's appliance valve on the leaking flex hose was turned off, and this action was recorded within our Emergency Response System (ECS) for Leak Ticket XL090033391, it was not recorded on the Red Tag as required. Customer Operations has reviewed CE Specification G-11837 and the Requirements for Red Tag documentation with their employees. Customer Operations management will verify that the information on the Red Tags is complete.***

**Areas of Concern**

1. Con Edison procedure G-11837-21 states, *"In New York City, written notice of a class A condition, including customer name, address, tag issue date, and description of condition shall be prepared by Gas Distribution Services and sent to the Dept of Buildings or other appropriate agencies."*

Staff suggests that a time period be included indicating when written notice will be provided to the Department of Buildings.

**Con Edison's Response**

***We agree with Staff's concern and will modify gas specification G-11837 to include a 90-day time period from when an "A" tag is issued to when written notice (e-mail) will be provided to the New York City Department of Buildings. This will be completed by September 30, 2010.***

2. G-11837-21.13.0: Follow-up of warning tags  
13.3: *Temporary repairs and made safe conditions where the unit was left on shall be re-inspected after a maximum of 5 calendar days. If the condition has*

*not been permanently repaired, or has not been scheduled for timely repair, the controlling valve shall be shut off (class “B” condition) or shut off and locked (for a class “A” condition). The class “C” Warning Tag shall be upgraded to its original condition (class “A”).*

The following are instances where a class C warning tag was issued and Con Edison failed to re-inspect the temporary repair made, and take further action as required under said procedure.

XL-09002536

XL-09003510

XL-09003640

***Con Edison’s Response for Warning Tag XL09002536 - 31 Rochambeau Avenue***

***We respectfully do not accept this finding. For Warning Tag XL09002356 31 Rochambeau Avenue the customer was notified of the 5 calendar day requirement to make permanent repairs, daily inspections occurred and on the evening of the sixth calendar day, when no repair was found, turn-off was scheduled and completed on the following morning.***

***Con Edison’s Response for Warning Tag XL09003510 - 674 E. 149<sup>th</sup> Street***

***We respectfully do not accept this finding. The temporary repair was on Con Edison piping and was issued for record purposes only to assure both a timely completion of a permanent repair and daily re-inspection, which occurred. This temporary repair involved tack welding to stop a leak found on 5/22/09 and was permanently repaired on 6/3/09 by Con Edison personnel.***

***Con Edison’s Response for Warning Tag XL09003640 – 2220 E. Tremont Avenue***

***We respectfully do not accept this finding. This temporary repair was on a customer’s that supplied service to 3 buildings and 195 individual customers. The customer’s plumber was actively working to repair the leak prior to and after the 5 day period in question. The leak was checked daily and CE Energy Services Department and the customer worked together to ensure the timely repair of the leak.***

**Consolidated Edison of New York  
2010 Violation Specifics - Record Audit  
Manhattan Gas Operations - OHQ**

Staff used a statistically based auditing approach to determine the number of records to be reviewed that would yield 95% confidence during the audit of the listed code mandated functions.

**Warning Tag:**

Staff recently conducted a review of a select number of Warning Tags, Class A, B and Class C, issued by Con Edison Manhattan Gas Operations - Gas Distribution Service (GDS). The purpose of the review was to verify compliance with the Natural Gas Safety Code - 16 NYCRR PART 261 and Con Edison Standard Operating Procedures.

The following sections of 16 NYCRR PART 261 and company procedures were reviewed during the audit:

16 NYCRR PART 261 - Warning Tag  
Con Edison procedure, G-11837-21, Procedure for the investigation of an inside leak or odor call and issuance of a Warning Tag  
CENY Cold Weather Policy- 3-2-29 (Cold Weather Policy)

No non-compliance issues were identified with the records reviewed by staff.

**Odorization**

Staff audited 12 odorant sampling records associated with testing performed in 2009 (one for each month). Staff also requested documentation demonstrating that the instruments used during the monthly odorant test (odorators) were calibrated. Staff did not identify any noncompliance issues with odorant sampling or calibration records.

**Transmission Main Valves**

Staff conducted record and procedure audit of Consolidated Edison Company of New York, Inc. (Con Edison) to ensure compliance with 16 NYCRR 255.745

In particular, staff reviewed inspection and maintenance records required under said section of safety code.

No noncompliance issues were noted with the records reviewed by staff.



**Area of Concern**

While reviewing monthly odorant records, staff noted that the same employee (ID# 42972) was used for six months consecutively to perform the odorant sampling. Con Edison should ensure that qualified personnel are routinely rotated and that the affects of smoking habits, colds and other condition of health, are considered when selecting personnel to perform odorant testing.

***Con Edison's Response***

***Con Edison respectfully declines the suggestion by the PSC Staff. Con Edison has many personnel who are operator qualified for this task. However, our experience indicates that using select personnel yields greater accuracy and consistency for this infrequently performed test. Adverse performance considerations are covered during training.***

**Consolidated Edison of New York  
2010 Violation Specifics - Record Audit  
Queens Gas Operations - OHQ**

Staff used a statistically based auditing approach to determine the number of records to be reviewed that would yield 95% confidence during the audit of the listed code mandated functions.

**Warning Tags**

**16 NYCRR 261.65(a) - Warning tag records - 1 Violation - 1 Occurrence**

*A class "A" condition presents an immediate hazard requiring the gas to be shut off & the meter locked unless the affected area can be effectively isolated from the rest of the gas system.*

Location: 160-15 78 Rd

Class "A" tag issued: 1/17/09

Reason: Gas leak in house piping. No indication that the gas was shut off and the meter locked, or that the affected areas was effectively isolated.

***Con Edison's Response***

*We accept this finding. A class "A" tag and a class "C" tag was issued for this location at the same time. The mechanic inadvertently put the information for the "A" tag on the "C" tag and the gas was shut off, locked and restored later that day after a plumber made the necessary repairs. The mechanic was counseled on attention to detail when filling out company documents.*

**16 NYCRR 261.59 - Warning tag: Class B condition - 1 Violation - 2 Occurrences**

The following are two instances where Con Edison rendered the condition temporarily safe, left the gas on, but failed to re-inspect as required.

1. Location: 80-05 252 St., Queens  
Tag Issued 2/13/2009.

***Con Edison's Response***

*We accept this finding. However, our records indicate that a class "C" tag was issued at this location for a corroded vent line which was re-inspected and repaired on 2/20/10. The Queens GDS mechanics will be given a tailboard talk reminding them the requirements for timely follow-up inspections and recordkeeping.*

2. Location: 29-07 150<sup>th</sup> St, Queens  
Tag issued 9/1/2009

***Con Edison's Response***

***We accept this finding. However, our records indicate that a class "C" tag was issued at this location for a corroded vent line. The Queens GDs mechanics will be given a tailboard talk reminding them the requirements for timely follow-up inspections and recordkeeping.***

**Leaks**

**16 NYCRR 255.819(a) – Leaks: Follow-up inspection: 1 Violation - 1 Occurrence**

Leak Ticket: QL09004731

Location: 146-22 20<sup>th</sup> Rd

A repair was made on a 4-inch steel main by installing six clamps on 9/8/2009; the required 14-30 day follow-up inspection was not conducted until 10/9/2009.

***Con Edison's Response***

***We accept this finding. The construction coordinator was counseled on the requirements of G-11809 and the associated time frame for a follow-up inspection after a gas main repair.***

**Odorization**

**16 NYCRR 255.603(d) - General Provisions - 1 Violation - 2 Occurrences**

Con Edison procedure G-11849-3 section (5).D states, "After connecting to the test outlet, the operator shall gradually increase the connection of gas until the odor of gas is first detected. This is the threshold level, and shall be recorded on the test report card. The threshold level ***shall be greater than 0.00.***"

The following are two instances where the threshold reading was recorded as 0.00% gas-in-air with no additional follow-up action.

1. Test Location: 23-17 35<sup>th</sup> St, Queens  
Test Date: 10/22/09
2. Test Location: 40-18 214 PL, Queens  
Test date: 1/18/09

### ***Con Edison's Response***

***We accept these findings. Con Edison Procedure G-11849 was reviewed with all Queens GDS personnel. The review was completed on January 31<sup>st</sup>, 2010.***

### **Transmission Main Valve**

Staff conducted a record and procedure audit of Consolidated Edison Company of New York, Inc. (Con Edison) to ensure compliance with 16 NYCRR 255.745

In particular, staff reviewed inspection and maintenance records required under said section of safety code.

No noncompliance issues were noted with the records reviewed by staff.

### **Area of Concern**

1. Staff noted that Con Edison issued a Class C warning tag for the condition noted below.

Location: 160-15 78 Rd

Class "C" tag issued 1/17/09

Reason: Gas vent line on service regulator. Action taken: Meter was locked.

Since Con Edison elected to lock the meter, staff is questioning what actions were taken to ensure that a hardship condition did not result in the shutting off the meter; and what follow-up actions were taken to correct the condition found.

### ***Con Edison's Response***

***We respectfully disagree with this concern. Both a class "A" tag and a class "C" tag was issued for this location at the same time. The mechanic inadvertently put the information for the "A" tag on the "C" tag and the gas was shut off and locked as required for a Class "A" condition. This misplaced recording of information resulted in the PSC Staff's concern. The gas service was restored later that day after a plumber made the necessary repairs. The mechanic was counseled on attention to detail when filling out company documents.***

**Consolidated Edison of New York  
2010 Violation Specifics - Record Audit  
Westchester Gas Operations - OHQ**

Staff used a statistically based auditing approach to determine the number of records to be reviewed that would yield 95% confidence during the audit of the listed code mandated functions.

**Warning Tags**

**16 NYCRR 261.63 Warning tag: Action and follow-up - 1 Violation - 1 Occurrence**

*(d) Whenever a warning tag is issued, regardless of the class of the condition, the operator shall attempt to notify the customer and obtain a signature acknowledging receipt of such notice.*

*(2) If the operator can not obtain a signature, an additional notice shall be provided to the customer stating that a notice of hazardous condition tag has been issued and the corrective actions that are required.*

Con Edison issued a class "C" warning tag on 1/14/10 due to a defective electronic ignition on a range within apartment 3 at 418 N. Terrace Ave, Mount Vernon, NY. At the time of issuance a signature was not obtained from the customer. The additional notice, a letter, was sent by Con Edison on 2/16/10. The intent should be to immediately notify the customer following the issuance of the warning tag so that corrective actions can be taken to address the hazard.

***Con Edison's Response***

***We accept this finding. Our policy is to send out letters notifying the customers of the hazard found, within 10 days, for all tags without a signature. We have held a tailboard talk to remind all appropriate personnel of this requirement.***

**Area of concern**

1. Con Edison receives gas from two interstate pipeline operators (Tennessee Gas and Algonquin) in Westchester County. Con Edison also has a high pressure gas main, which supplies Westchester from the Bronx. Periodic odorant sampling in Westchester County is conducted once a month at a specific location. The entire Westchester gas service territory is divided into 5 distinct areas with a total of 37 odorant sampling locations (approximately 5 locations in each area). Of these 37 locations, 12 are tested during the year. The intent is to select 12 different sample points the following years until all sample points are tested, then the cycle is repeated. Considering the geography of the County, and having more than one

gas supplier feeding the area, Con Edison should consider sampling multiple locations during the prescribed sampling period to ensure adequate odorant levels throughout the distribution system. Considerations should be given to system extremities as well as low points. This same process should be implemented in all of Con Edison's gas operating areas.

***Con Edison's Response***

***We respectfully decline the suggestion by the PSC Staff. While our gas distribution system is a network fed from multiple suppliers, the flow directions change due to changes in demand, time of day and season. In Westchester, a different area is tested each month with all areas of Westchester tested at least twice in any year. Our present process adequately tests odorant level throughout the area and we do not believe that any other method of sampling will better represent the odorant levels within the system.***

**Consolidated Edison of New York  
2010 Violation Specifics - Record Audit  
Central Gas Operations - OHQ**

Staff used a statistically based auditing approach to determine the number of records to be reviewed that would yield 95% confidence during the audit of the listed code mandated functions.

**Leak Instrument Sensitivity**

Con Edison uses GMI Gas Surveyors (model's 3, 6 & 11) and Detecto Pak-Inferred (DP-IR) gas measurement instruments during leak investigations and leakage surveys throughout its gas franchise territory. These instruments measure levels of methane (CH<sub>4</sub>), Carbon monoxide (CO), oxygen (O<sub>2</sub>) levels.

Staff reviewed the following sections of 16 NYCRR 255 and Con Edison Standard Operating Procedures during this audit:

- 16 NYCRR 255.809: Leaks-Instrument Sensitivity Verification
- CENY Procedure G-11861-4(Procedure for the inspection, maintenance & operation of gas measurement instruments)
- CENY Technical Services Laboratory Procedure (Maintenance & Calibration of GMI Gas Surveyor)

**16 NYCRR 255.809(b) - Leaks: Instrument sensitivity verification  
1 Violation - 19 Occurrences**

*According to 16 NYCRR 255.809(b), "Each instrument utilized for leakage surveys and investigations must be tested against a known sample or in accordance with the manufacturer's recommended instructions once every three months for CGI's and solid state leak detection instruments and yearly for Hydrogen Flame Ionization (HFI) instruments."*

Upon reviewing GMI calibration records, Staff noted that the following indicators exceeded the required timeframe. As of 2/12/10, at the conclusion of staff's review, the instruments had not yet been calibrated. Con Edison needs to demonstrate that these instruments were not used while out of calibration to conduct leak investigations or leakage surveys.

**Bronx Gas Construction**

Serial Number	CPR Number	Last Test Date	Due for Calibration
16737	50571	9/1/2009	11/30/2009
16971	50605	5/1/2009	7/30/2009

**Sections: 594,756,156,192 and 288 Queens Gas Distribution Services**

Serial Number	CPR Number	Last Test Date	Due for Calibration
11581	48613	10/9/2009	1/7/2010
12368	49340	7/24/2009	10/22/2009
18765	51115	10/20/2009	1/18/2010

**Queens Regional Operations**

Serial Number	CPR Number	Last Test Date	Due for Calibration
11088	48772	10/5/2009	1/3/2010

**User Code: 911 Manhattan Chem Lab**

Serial Number	CPR Number	Last Test Date	Due for Calibration
18330	50982	5/17/2007	8/15/2007
18341	50993	5/18/2007	8/16/2007
22663	52836	3/3/2005	6/1/2005

**Manhattan Ch Lab W59**

Serial Number	CPR Number	Last Test Date	Due for Calibration
18344	50996	10/7/2009	1/5/2010
22661	52834	3/3/2005	6/1/2005

**Sections: 924 Queens Chem Lab AST Bldg - 138**

Serial Number	CPR Number	Last Test Date	Due for Calibration
18838	51138	7/21/2009	10/19/2009
18840	51140	6/25/2009	9/23/2009
18843	51143	10/21/2009	1/19/2010
18844	51144	6/24/2009	9/22/2009
18845	51145	10/1/2009	12/30/2009
18846	51146	10/1/2009	12/30/2009
18850	51150	8/24/2009	11/22/2009
18851	51151	6/12/2009	9/10/2009

***Con Edison's Response***

***We accept this finding. Two instruments, CGI serial number 22661 and 22663, have been removed from property records as lost or stolen with appropriate Police reports filed. All of the other instruments cited have been brought into compliance. Con***



*Edison has verified that the only instruments that would have been used for leak investigation were assigned to Queens Gas Distribution Services. These specific instruments were in locked cabinets and were assigned to employees who were out as long term sick or retired. We have increased the distribution of the Technical Services Overdue Reports to include the Queens GDS manager, planners and supervisors to assure our equipment stays in compliance.*

#### **16 NYCRR 255.603(d) - General provisions – 1 Violations - 7 Occurrences**

Con Edison procedure G-11861-4, Procedure for the Inspection, Maintenance and Operation of Gas Measurement Instruments as well as the Technical Services Laboratory Procedure states that, “GMI Gas Surveyors have to be returned to the Technical Services Laboratory within a 22-24 months period, for the 2-year recall (Safety inspection).”

The following instances where Con Edison failed demonstrate that the safety inspection was performed within the required timeframe.

##### **Bronx Gas Construction**

Serial Number	CPR Number	Due for Recall
16950	50584	1/12/2010

##### **Manhattan Chem Lab E River**

Serial Number	CPR Number	Due for Recall
18330	50982	5/17/2009
18341	50993	5/18/2009
22663	52836	3/30/2006

##### **Manhattan Chem Lab W59**

Serial Number	CPR Number	Due for Recall
22661	52834	4/2/2006

##### **Queens Chem Lab AST Bldg-138**

Serial Number	CPR Number	Due for Recall
18839	51139	2/8/2010
18848	51148	12/1/2009

### *Con Edison's Response*

*We accept this finding. Two instruments, CGI serial number 22661 and 22663, have been removed from property records as lost or stolen with appropriate Police reports filed. All of the other instruments cited have been brought into compliance. Con Edison has verified that only one of these instruments would have been used for leak investigations, specifically, CGI serial number 16950. This instrument was satisfactorily tested in the depot checker on 1/10/10, due for its two year service on 1/12/10, and removed from service on 2/18/10. The actual two year service was completed on 3/2/10. We will increase the distribution of the Technical Services Overdue Reports to include GDS and Gas Construction managers, planners and supervisors to assure our equipment used stays in compliance.*

### **Transmission lines: Patrolling**

CENY has a total 84 miles of transmission main throughout its service territories (Bronx, Manhattan, Queens, and Westchester). The transmission main in each of the gas operating areas has a corresponding section ID. Con Edison patrols its transmission pipeline system on a weekly basis not to exceed 12 calendar days. Staff requested patrolling records (maintained by Corrosion Control) of all four-gas operating areas for the month of January, November, and December 2009, as well as records required to be retained by the Emergency Response Center for the months of April, May, and June 2009.

### **16 NYCRR 255.17(b) - Preservation of records - 1 Violation – 208 Occurrences**

Con Edison procedure G-11863-6 section 9.2(a) (revision date 1/30/2008) states, “*the patrol (visual survey) is conducted in all four-gas operating areas to observe the conditions along the route of the pipelines as listed in tables II & IV of specification G-11810. Their observation shall be recorded on the electronic form in Appendix A.*”

Retention of transmission patrolling records is required by 16 NYCRR 255.17(b). Staff requested that Con Edison (corrosion dept) provide documentation (Weekly Transmission main patrol Report) to demonstrate that said patrols were performed. Although employee route sheets indicate that the patrol was performed, Con Edison was unable to provide the documentation required by appendix A of the procedure.

### *Con Edison's Response*

*We accept this finding. We will revise procedure G-11863 by September 30, 2010 to reflect our actual practice which utilizes electronic records. The electronic records will affirmatively document if there were no anomalies found and if any are found, it will be recorded by the Gas Emergency Response Center in “Gas Contingencies”.*

## Areas of Concern

1. The last paragraph of section 9.2(a) of Con Edison procedure G-11863-6 states that *Corrosion Control shall retain copies of all reports for 5 years*. 16 NYCRR 255.17(b) clearly states that “*All records pertaining to any pipeline designed to operate at 125 PSIG or more shall be kept in files reserved for that pipeline only and retained for as long as the line remains in service.*” Therefore, Con Edison needs to amend its procedure to reflect the appropriate record retention requirement.

### *Con Edison’s Response*

***We accept this concern. We will revise procedure G-11863 by September 30, 2010 to reflect the code’s retention period requirement.***

2. Section 4.1 and Appendix C of the same procedure depicts two different contact numbers for the Emergency Response Center.

### *Con Edison’s Response*

***We accept this concern. However, both numbers provided in section 4.1 and Appendix “C” of Procedure G-11863 are accurate and valid contact numbers for the Emergency Response Center. They are both listed for redundancy in the event that one of the two numbers is unavailable.***

## Transmission Valves

### **16 NYCRR 255.603(d) - General provisions - 1 Violation - 2 Occurrences**

Con Edison specification G-11803-21 (Periodic Inspection of distribution valves) section 6.2 (A) states “faults on sectionalizing valves must be corrected within 60 days of the inspection date.” Listed below are two valves where the repair timeframe of 60 days was exceeded.

Valve #	Fault	Identified date	Repair date
Q 9795	Inoperable	5/19/2009	11/20/2009
W 27597	Inoperable	3/11/2008	11/07/2008

### ***Con Edison's Response***

***We accept your findings. By October 31, 2010 we will review and analyze all valve faults that were not corrected within 60 days for the past two years. Based on the analysis, we will strengthen our work flow and reporting processes to better ensure that timely repairs and inspections occur to remove valve faults from our system. We will make any necessary process changes by June 30, 2011.***

### **255.745 (c) - Valve maintenance: Transmission lines - 1 Violation - 9 Occurrences**

The above referenced section of code states that *"At the time of the periodic inspection, valves will be checked for external leakage."* Staff's review noted that Con Edison failed to check the following valves for external leakage as required, instead Con Edison documented that a leakage was not applicable since the valves were located above ground. The referenced code section makes no distinction, therefore leakage checks must be performed on transmission valves whether buried or exposed. Con Edison must implement the necessary steps to ensure that compliance is achieved.

1. 24" – 10791	8/6/2009	2/25/2009
2. 30" – 11089	8/6/2009	2/25/2009
3. 24" – 6527	8/6/2009	
4. 12" – 10911	8/6/2009	2/25/2009
5. 24" – 10888	8/6/2009	2/25/2009

### ***Con Edison's Response***

***We accept your findings. We will record the use of soap water for all above ground / exposed valve leak inspections.***

### **Area of Concern**

16 NYCRR 255.745(b) and 255.747(c) - Valve maintenance: Transmission lines and Distribution systems, states: *"The location of all valves in transmission lines shall be designated on appropriate records, drawings or maps in relation to aboveground structures, so that the valves and associated access covers can be readily located when the ground is covered with snow and ice. Since there may be changes or alterations in aboveground structures over a period of time, the accuracy of the reference points established shall be verified at the time of the periodic inspection."*

In review of Con Edison's valves inspection records, staff noted that although valve landmark locations are provided, confirmation of accuracy is not documented during each periodic valve inspection. Documenting that the landmarks were checked for accuracy would demonstrate that verification was performed.

### ***Con Edison's Response***

***We respectfully decline this suggestion. Our Gas Specification G-11803, Section 5.1 requires all status items to be verified. In addition, the Computer Aided Dispatch System which captures the majority of our valve inspections, has a field that requires the inspector to verify that the valve status information is correct.***

### **Corrosion Control**

#### **16 NYCRR 255.475(b) - Internal corrosion control: General 1 Violation - 9 Occurrences**

***“Whenever any pipe is removed from a pipeline for any reason, the internal surface must be inspected for evidence of corrosion.”***

A review of records associated with completed steel replacement projects noted that Con Edison failed to conduct the required internal corrosion inspection when a section of pipe was removed. The inspection is required by Part 255 and Con Edison work procedures G-11814-16, IP-7-8, IP-9-12 and IP-40-0. The projects are as follows:

1. ML 09008406, 222 5<sup>th</sup> Avenue – steel service inserted
2. ML 09001190, 328 West 89<sup>th</sup> Street – steel service inserted
3. ML 09000648, 230 East 79<sup>th</sup> Street – steel service inserted
4. ML 09001158, 205 West 137<sup>th</sup> Street – steel service inserted
5. ML 09009057, 525 West 150<sup>th</sup> Street – steel service inserted
6. ML 09007720, 600 West 188<sup>th</sup> Street – steel service replaced
7. XL 09002510, 866 East Tremont Avenue – Removed 2 feet of steel main
8. XG 10003105, Carver Loop, Co-op City Blvd – Replaced 25 feet of steel main
9. ML 10002473, 40 East 4<sup>th</sup> Street - Replaced 50 feet of steel main.

### ***Con Edison's Response***

***We accept these findings. We will change the back of our electronic 50-13R form to document the internal inspections of metallic mains and services for evidence of internal corrosion by June 30, 2011.***

### **Areas of Concern:**

1. Staff noted that Con Edison, on certain occasions, failed to document internal inspections required by 16NYCRR Part 255.475(b). The inspection must be conducted during steel main (bare or wrapped) or cast

iron replacement projects, service line insertion/replacement where practical, steel main tie in jobs, etc., to ensure pipeline integrity. With the promulgation of the DIMP rule, inspection and documentation will be vital in determining pipeline threats and mitigation.

***Con Edison's Response***

***We accept this concern. We will change the back of our electronic 50-13R form to document the internal inspections of metallic mains and services for evidence of internal corrosion by June 30, 2010.***

2. The main replacement layout format used in the Manhattan operating area was observed to be different from what is used in the Bronx. The Manhattan layout currently does not have the capability of capturing the condition of existing mains (external and internal corrosion information) at tie in locations. Con Edison should consider adopting a uniform format, which would allow the capture of required inspection data companywide.

***Con Edison's Response***

***We accept this concern. We will adopt a uniform layout format to capture the condition of existing metallic mains (external and internal corrosion information) by September 30, 2010.***

3. Internal inspections required of steel mains during leak repairs, when replacement is affected, is documented on the backside of the leak history report (GA 4640R 6/06). Staff noted continued usage of prior versions of the leak history report that had no check boxes to document internal and external inspection results. Moreover, the current electronic leak history report does not allow the capture of similar inspection results.

***Con Edison's Response***

***We accept this concern. We will change the back of our electronic 50-13R form by June 30, 2011 to document the internal inspections of metallic mains and services for evidence of internal corrosion and will assure that only the latest versions of the hard copy forms are used.***