

Document Request 1

From: [Anoush C. Holaday](#)
To: [Colletti Alexandria](#); [Kilford Engineering](#)
Cc: [David S. Webster](#); [REDACTED]; [REDACTED]; [Allen, Benjamin](#); [Lynum Sean](#)
Subject: RE: Document Request - NTSB Case PLD19MR001
Date: Friday, November 22, 2019 12:08:08 PM

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Alex,

I hope this email finds you well. I write on behalf of Kilford Engineering, Inc. in response to your document request email below.

All requested documents can be found at the following Dropbox link:

[REDACTED] We can also burn and mail you a disk containing the documents if you'd like. Also, below please find responses to each document request outlining additional information that we thought would be helpful as you navigate the documents. Finally, Kilford and my office are readily available for any meetings, requests for clarification, or further informational inquiries that you may have as you continue your investigation. We welcome you to reach out anytime and we would be more than happy to offer our help.

1. Scope of work for project being executed on February 6, 2019, including any available drawings. **Response: Attached in the above-listed Dropbox folder please find the AFW/Kilford contract, Kilford proposal, and the specific plans for the work order.**
2. Details on any work performed prior to February 6, 2019 along Geary Boulevard between Parker Avenue and Commonwealth Avenue by Kilford Engineering. **Response: The only work performed prior to 2/6/19 was sawcutting of the pavement on 2/5/19. Attached in the above-listed Dropbox folder please find photos depicting this work.**
3. Contracts with Advanced Fiber and/or MasTec related to work performed on February 6th, 2019. **Response: Attached in the above-listed Dropbox folder please find the AFW/Kilford contract, Mastec/AFW contract, and a redacted Verizon/Mastec contract and amendment. We're not in possession of an unredacted version of the Verizon/Mastec contract.**
4. Specifics on mini-excavator used on site – manufacturer, model number, age. **Response: The mini-excavator was a 2018 CAT 305E2. It was purchased in November 2018. Attached in the above-listed Dropbox folder please find a sales quote and valuation report related to the insurance claim for the equipment that was lost on 2/6/19.**
5. List of other tools used on site with as much specificity as possible, including equipment used to break-up/remove concrete. **Response: A Cat 226 Skid Steer with breaker attachment was used to break the concrete. Attached in the above-listed Dropbox folder please find the specifications for the Cat 226 Skid Steer & Altas Copco Breaker attachment. The mini-excavator discussed in line item number 4 above was used to remove the concrete and load it into a truck to be hauled away after it was broken up. The other used tools were hand tools (Shovels, Brushes, Pry Bars, Hammers), power**

tools (Drills, Sawzall, Grinder), Cut-off saw, measuring tapes, lifting slings, chains, shackles, steel plates, and compaction equipment (Jumping Jack & Vibro Plate Compactor).

6. Documentation on Kilford Engineering's excavation practices/procedures. **Response: Attached in the above-listed Dropbox folder please find the Code of Safe Practices, which includes a copy of the excavation practices and procedures under section 12 ("Trenching and Excavation Safety Plan").**
7. All training records for all 5 employees who were on site on February 6, 2019. **Response: Colin Codd was the designated site supervisor and person in charge. Attached in the above-listed Dropbox folder please find Colin Codd's resume and Competent Person in Excavation Card.**
8. State licenses for all 5 employees who were on site on February 6, 2019 (public records only have Mr. Tobin and Mr. Codd as licensed with the CSLB for Kilford Engineering). **Response: For clarification, the 5 employees that were on site at the time of the event were Colin Codd, Kevin Browne, Federico De La Torre, Emmett Blee, and Mark White.** Mr. Tobin and Mr. Codd are the CSLB-licensed employees for Kilford Engineering. This is compliant with CA state law. **Attached in the above-listed Dropbox folder please find copies of drivers licenses for Colin, Kevin, and Federico and the CSLB license. Mark and Emmett are no longer employees and we do not have access to their drivers licenses to get copies, but we can track them down and request them if you'd like.**
9. Documentation of any safety meetings performed on February 6, 2019. **Response: Attached in the above-listed Dropbox folder please find the Safety Meeting record completed by the Crew on 2/6/19 prior to the start of work that day.**
10. Information regarding 811 locate – which Kilford Engineering employee met with the PG&E locator on what date, what was discussed, what area the 811 request covered, etc. **Response: Attached in the above-listed Dropbox folder please find the 4 USA and PGE tickets.**
11. Details on the prior line strike of a city water main as mentioned in Mr. Codd's interview, including any follow-up activities undertaken by Kilford Engineering to address the root cause of the line strike (additional training provided, procedures updated, etc.). **Response: Attached in the above-listed Dropbox folder please find pictures related to this incident. One of the pictures contains an incident report that was completed by William Tobin on the day of the event. There was an unmarked 2" Water service that was in rocky ground that was difficult to dig and required a bit more effort/force than normal ground to dig. Due to the nature of the ground and the efforts required to dig it, the unmarked water service was not located or found and got damaged during the excavation process. After the Hawthorne St. event, Kilford completed an internal review of what happened and came up with some follow up activities that could be undertaken to avoid this happening in the future. Attached in the above-listed Dropbox folder please find the Incident and Corrective Action Report (which contains a note to amend the previous incident report that was completed on site shortly after the event.) Notably, this situation and ground would have not been similar to Geary Blvd. With Geary Blvd., the native soil was sandy that allowed Kilford to have a blade/blunt face added to the teeth of the excavator so that the trench could be excavated by peeling down in 1" increments. With the rocky/harder soil conditions on Hawthorne St., we could not use the blunt blade on the excavator**

bucket and instead needed the sharp teeth of the bucket exposed in order to penetrate the ground being excavated. Had the water service on Hawthorne St been located in sandy ground like on Geary, the blade/blunt face on the teeth of the excavator bucket would have given the excavator operator a far better chance of finding the water service and not damaging it as the blunt face and the small 1" excavation increments would have prevented penetration of the water service by the sharp teeth.

I'm available at your convenience.

Thanks,
Anoush

Anoush C. Holaday

Senior Counsel | Wood, Smith, Henning & Berman LLP
1401 Willow Pass Road, Suite [REDACTED] | Concord, CA 94520
[REDACTED] | T [REDACTED] | M [REDACTED]

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From: Colletti Alexandria [mailto:[REDACTED]]
Sent: Wednesday, November 06, 2019 8:24 AM
To: Kilford Engineering
Cc: Anoush C. Holaday; David S. Webster; [REDACTED]; [REDACTED]; Allen, Benjamin; Lynum Sean
Subject: Document Request - NTSB Case PLD19MR001
Importance: High

Good morning Mr. Tobin,

The NTSB requires documentation from Kilford Engineering in order to complete our investigation. Please provide the following documents by **November 22, 2019** via email. Please let me know if you have any questions or need clarification on the requested items.

1. Scope of work for project being executed on February 6, 2019, including any available drawings
2. Details on any work performed prior to February 6, 2019 along Geary Boulevard between Parker Avenue and Commonwealth Avenue by Kilford Engineering
3. Contracts with Advanced Fiber and/or MasTec related to work performed on February 6th, 2019
4. Specifics on mini-excavator used on site – manufacturer, model number, age
5. List of other tools used on site with as much specificity as possible, including equipment used to break-up/remove concrete
6. Documentation on Kilford Engineering's excavation practices/procedures
7. All training records for all 5 employees who were on site on February 6, 2019
8. State licenses for all 5 employees who were on site on February 6, 2019 (public records only have Mr. Tobin and Mr. Codd as licensed with the CSLB for Kilford Engineering)
9. Documentation of any safety meetings performed on February 6, 2019
10. Information regarding 811 locate – which Kilford Engineering employee met with the PG&E locator on what date, what was discussed, what area the 811 request covered, etc.

11. Details on the prior line strike of a city water main as mentioned in Mr. Codd's interview, including any follow-up activities undertaken by Kilford Engineering to address the root cause of the line strike (additional training provided, procedures updated, etc.)

So you are aware, I did not receive any errata back from Mr. Codd or Mr. De la Torre Martin. As such, they have been marked as having no corrections to their respective transcripts. If this is incorrect, please notify me by **November 15, 2019**. The transcripts were emailed to Mr. Codd and Mr. De la Torre Martin on April 22, 2019 and May 30, 2019 respectively.

Thank you,
Alex

Alex C. Colletti

Accident Investigator – Pipeline
National Transportation Safety Board

[REDACTED]

Office: [REDACTED]

Cell: [REDACTED]

Fax: [REDACTED]

Document Request 2

From: [Anoush C. Holaday](#)
To: [Colletti Alexandria](#)
Cc: [Kilford Engineering](#); [David S. Webster](#); [REDACTED]; [REDACTED]; [Allen Benjamin](#); [Lynum Sean](#)
Subject: RE: Document Request - NTSB Case PLD19MR001
Date: Monday, December 16, 2019 7:28:23 PM

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Alex,

Thank you greatly for your patience.

As for your first request, please access the "12.16.19" folder under the following dropbox link where you will find the requested manual:

[REDACTED]

As for your second request, we would like to provide some clarification. The facility that got broken was not a water main, it was a water service. The water main was marked, but the service lateral running off it that got broken was not marked. We previously provided all available pictures (still available at the dropbox link above in the "11.22.19" folder under "Item 11") that show the location of the service break and also the lack of markings. There was no claim/bill from SFWD as the repair crew on site that day agreed that the service was not marked. Kilford has no further additional docs or photos to provide, though they did have a preconstruction video of the street. They're having technical difficulties with the software trying to retrieve the video but are hoping by early January they may be able to retrieve them. Please let us know if you're interested in the video and we will make sure to keep you apprised of our retrieval efforts.

We remain readily available for any requests or further inquiries that you may have as you continue your investigation. Please reach out anytime.

Thanks,
Anoush

Anoush C. Holaday

Senior Counsel | Wood, Smith, Henning & Berman LLP
1401 Willow Pass Road, Suite [REDACTED] | Concord, CA 94520

[REDACTED] | T [REDACTED] | M [REDACTED]

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From: Colletti Alexandria [mailto:[REDACTED]]
Sent: Friday, December 13, 2019 4:58 PM
To: Anoush C. Holaday
Cc: Kilford Engineering; David S. Webster; [REDACTED]; [REDACTED]; Allen Benjamin; Lynum Sean
Subject: Re: Document Request - NTSB Case PLD19MR001

Good evening Anoush,

Next Wednesday is acceptable. Thank you for your prompt response in the requested time frame.

Thank you,
Alex

Alex Colletti
Pipeline Accident Investigator
NTSB
Cell [REDACTED]

From: Anoush C. Holaday [REDACTED]
Sent: Friday, December 13, 2019 5:37 PM
To: Colletti Alexandria
Cc: Kilford Engineering; David S. Webster; [REDACTED]; [REDACTED]; Allen, Benjamin; Lynum Sean
Subject: Re: Document Request - NTSB Case PLD19MR001

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Hi Alex,

Thanks for your email and your requests. We are diligently looking into both, but given some internet difficulties to upload and send you applicable documents, we'd request that you allow us until next Wednesday to adequately respond. Please let me know if this is acceptable and if you have any questions.

Thanks,
Anoush

On Dec 10, 2019, at 8:21 AM, Colletti Alexandria [REDACTED] wrote:

Hello Anoush,

Please provide the Kilford Engineering Inc field manual for Trenching & Excavation Competent Person manual as noted in Section 12, Trenching and Excavation Safety Plan, of the Kilford Employee Code of Safe Practices (reference below in yellow). If possible, we would prefer to have this document by **December 13, 2019**. If this date is not possible, please let me know by December 13 when the document can be expected.

Additionally, do you have any documentation of the one-call locate done for item 11 below (USA ticket W836200034), including any photographs of the area of the water main strike prior to excavation showing no markings? Please provide any available documentation relating to this locate by **December 20, 2019**. If this date is not possible or the documentation is not available, please let me know by December 13.

Thank you,
Alex

Reference from Kilford Code of Safe Practices:

Note: Refer to the Kilford Engineering Inc field manual for Trenching & Excavation Competent

Person manual for all the California OSHA and Federal OSHA regulations and hazards in reference to trenching & excavation.

Document Request 3

From: [Anoush C. Holaday](#)
To: [Colletti Alexandria](#)
Cc: "[Kilford Engineering](#)"; [David S. Webster](#); [REDACTED]; [REDACTED]; [Allen, Benjamin](#); [Lynum Sean](#)
Subject: RE: Document Request - NTSB Case PLD19MR001
Date: Friday, January 3, 2020 5:45:42 PM
Attachments: [W836200034 - Hawthorne St USA Ticket.pdf](#)

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Good afternoon Alex,

Thank you for your patience on our response.

Attached and also at the following dropbox link under "1.3.20" please find the USA ticket related to work area on Hawthorne St where the water service got broken:

[REDACTED]

You'll note no activity or response from SFWD on the ticket. Kilford has submitted hundreds of USA ticket requests in San Francisco over the course of the last decade and SFWD has never provided a response to confirm their utilities have been marked. Kilford's discussions with other contractors that routinely perform work in San Francisco confirm the same experience with SFWD.

Kilford's standard practice has been to check the work location 1-2 days before it is scheduled to begin work for fresh marks. If fresh marks are not visible, Kilford calls the SFWD's mark & locate foreman, who sends someone within a couple of hours or the next morning to complete the markings. In the case of Hawthorne St., water marks were visible before Kilford started the work.

Please don't hesitate to reach out with any other requests or further inquiries.

Thanks,
Anoush

Anoush C. Holaday

Senior Counsel | Wood, Smith, Henning & Berman LLP
1401 Willow Pass Road, Suite [REDACTED] | Concord, CA 94520

[REDACTED] | T [REDACTED] | M [REDACTED]

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From: Anoush C. Holaday
Sent: Thursday, December 19, 2019 11:34 AM
To: 'Colletti Alexandria'
Cc: Kilford Engineering; David S. Webster; [REDACTED]; [REDACTED]; Allen, Benjamin; Lynum Sean
Subject: RE: Document Request - NTSB Case PLD19MR001

Hi Alex,

Thanks for the clarification, I appreciate it. I will work with Kilford to see what more they can provide. My point person at Kilford is out of the country for the holidays through next week. Would getting you information by 1/3 be acceptable?

Thanks,
Anoush

Anoush C. Holaday

Senior Counsel | Wood, Smith, Henning & Berman LLP
1401 Willow Pass Road, Suite [REDACTED] | Concord, CA 94520

[REDACTED] | T [REDACTED] | M [REDACTED]

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From: Colletti Alexandria [mailto:[REDACTED]]
Sent: Thursday, December 19, 2019 7:15 AM
To: Anoush C. Holaday
Cc: Kilford Engineering; David S. Webster; [REDACTED]; [REDACTED]; Allen, Benjamin; Lynam Sean
Subject: RE: Document Request - NTSB Case PLD19MR001

Hello Anoush,

I am looking specifically for the tickets related to the job on Hawthorne Street. Each excavation requires its own ticket, and since that job was a completely different project several months before and at a different location, Kilford should have submitted a separate ticket for it. That ticket is what I am looking for, not the tickets submitted for the Geary Boulevard work which you have already provided.

Thank you,
Alex

From: Anoush C. Holaday [REDACTED]
Sent: Wednesday, December 18, 2019 3:16 PM
To: Colletti Alexandria [REDACTED]
Cc: Kilford Engineering [REDACTED]; David S. Webster
[REDACTED]; [REDACTED]; [REDACTED]; Allen, Benjamin
[REDACTED]; Lynam Sean [REDACTED]
Subject: RE: Document Request - NTSB Case PLD19MR001

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Hi Alex,

Thanks for the clarification. It sounds like you're looking for tickets beyond the USA and PG&E tickets provided under "Item 10", can you please confirm that's the case? If so, I will work with Kilford to see what more they can provide. Please note that my point person at Kilford is out of the country for the holidays through next week; would getting you information by 1/3 be acceptable?

Thanks in advance,
Anoush

Anoush C. Holaday

Senior Counsel | Wood, Smith, Henning & Berman LLP
1401 Willow Pass Road, Suite [REDACTED] | Concord, CA 94520

[REDACTED] | T [REDACTED] | M [REDACTED]

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From: Colletti Alexandria [REDACTED]
Sent: Wednesday, December 18, 2019 7:03 AM
To: Anoush C. Holaday
Cc: Kilford Engineering; David S. Webster; [REDACTED]; [REDACTED]; Allen, Benjamin; Lynum Sean
Subject: RE: Document Request - NTSB Case PLD19MR001
Importance: High

Anoush,

Thank you for the provided information.

Regarding the second request, I am specifically looking for the ticket(s) Kilford submitted to the local one-call/811 center requesting locate services prior to the excavation work performed. Kilford should have a copy of these ticket(s), which include positive confirmation from all facility owners, including SFWD, that they came out and located and marked in the requested area. From your narrative, it sounds as if SFWD did not perform a complete locate and mark per proper procedure. As part of the ticket documentation, SFWD should have either stated they performed the locate or not, and if they did, which lines they marked. My supposition is, from your evidence, that SFWD's notes on the ticket(s) will state they marked the water main and not mention the service (seeing as it wasn't marked per Kilford's narrative), but I need documentation to that effect.

Thank you,
Alex
