



# California Regional Water Quality Control Board Los Angeles Region



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Cal/EPA Secretary

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## FAX TRANSMITTAL FOR REGIONAL PROGRAMS SECTION

DATE: 8/18/09

TO: Mike Leslie

FROM: Valerie Carrillo

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MESSAGE: Sullivan Canyon 4d Water Quality Certification



# California Regional Water Quality Control Board Los Angeles Region



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Recipient of the 2001 Environmental Leadership Award from Keep California Beautiful

Arnold Schwarzenegger  
Governor

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Ms. Deanna Haines  
Southern California Gas Company  
Gas Transmission Technical Services  
9400 Oakdale Avenue, SC9314  
Chatsworth, CA 91311-6511

## WATER QUALITY CERTIFICATION FOR PROPOSED SULLIVAN CANYON MAINTENANCE ROAD CONSTRUCTION AND PIPELINE MAINTENANCE AND PROTECTION PROJECT, SULLIVAN CANYON CREEK, CITY OF LOS ANGELES, LOS ANGELES COUNTY (File No. 08-162)

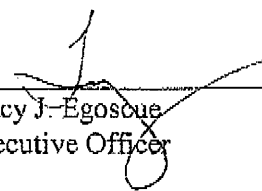
Dear Ms. Haines:

Board staff has reviewed your request on behalf of Southern California Gas Company for a Clean Water Act Section 401 Water Quality Certification for the above-referenced project. Your application was deemed complete on January 21, 2008.

I hereby issue an order certifying that any discharge from the referenced project will comply with the applicable provisions of sections 301 (Effluent Limitations), 302 (Water Quality Related Effluent Limitations), 303 (Water Quality Standards and Implementation Plans), 306 (National Standards of Performance), and 307 (Toxic and Pretreatment Effluent Standards) of the Clean Water Act, and with other applicable requirements of State law. This discharge is also regulated under State Water Resources Control Board Order No. 2003 - 0017 - DWQ, "General Waste Discharge Requirements for Dredge and Fill Discharges that have received State Water Quality Certification" which requires compliance with all conditions of this Water Quality Certification.

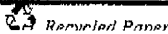
The Applicant shall be liable civilly for any violations of this Certification in accordance with the California Water Code. This Certification does not eliminate the Applicant's responsibility to comply with any other applicable laws, requirements and/or permits.

Should you have questions concerning this Certification action, please contact Valerie Carrillo, Lead, Section 401 Program, at (213) 576-6759.

  
\_\_\_\_\_  
Tracy J. Egosque  
Executive Officer

5/24/09  
\_\_\_\_\_  
Date

*California Environmental Protection Agency*



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**ATTACHMENT A**

**Project Information  
File No. 08-162**

1. Applicant: Southern California Gas Company  
9400 Oakdale Avenue, SC9314  
Chatsworth, CA 91311-6511  
Attn: Deanna Haines  
Phone: (818) 701-4534 Fax: (818) 701-3441
  
2. Applicant's Agent: Mr. Jason Kirschenstein  
2801 Townsgate Rd., Suite 213  
Westlake Village, CA 91361  
  
Phone: (805) 434-2804 Fax: (805) 980-5886
  
3. Project Name: Lines 3003 / 407 (Sullivan Canyon) Pipeline Protection
  
4. Project Location: Brentwood-Sullivan Canyon area, Los Angeles County  
  
Longitude, Latitude:  
  
118.525902, 34.125575  
North / upstream end of project area  
  
118.509665, 34.074835  
South /downstream end of project area
  
5. Type of Project: Pipeline / Maintenance Road Repair project
  
6. Project Purpose: The purpose of the proposed project is to repair and maintain existing natural gas pipelines and an associated maintenance road within Sullivan Canyon. The Southern California Gas Company (SoCalGas) Pipeline Protection Project (Proposed Project) facilitates compliance with the existing Department of Transportation (DOT) and California Public Utilities Commission (CPUC) requirements for safely operating and maintaining the two existing natural gas pipelines which run through Sullivan Canyon.

Channel migration over time in the canyon bottom has exposed portions of the previously buried pipeline that are now subject to creek flows. Maintaining and protecting the pipelines requires excavation for inspection and maintenance, and backfilling to certain required depths or protecting with structures (e.g. the proposed articulated concrete mats) that results in discharge of fill

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### Project Information File No. 08-162

material into the waters of the U.S. Similarly, the maintenance road has been subject to erosion from creek flows. Repairing the road requires the discharge of fill material where the creek and road are in the same location, where the road falls within the OHWM, and at locations where the road crosses the low-flow channel of the creek.

In order to perform the necessary pipeline maintenance activities, a maintenance road will be re-established through the Canyon to allow for inspections and/or repairs.

#### 7. Project Description:

The Proposed Project includes a set of currently required maintenance activities for pipeline exposure protection, pipeline integrity digs, and road repair activities described below that are expected to be completed over a five-year period. An ongoing long-term maintenance program also described below includes a series of anticipated routine maintenance activities to ensure pipeline safety in accordance with DOT and CPUC regulations expected over the lifetime of the pipelines. The project plans include plan view and cross section details of the currently known pipeline exposure, pipeline integrity digs, and road repair maintenance activities which have been identified to date. The project plans, titled Southern California Gas Lines 407 and 3003, Sullivan Canyon (Psomas, November 2008) were included with the application package and specifically identify sites of needed pipe repair and layout of the proposed road. The road repair will occur first, within a year of receiving all required permit authorizations. Once the road repairs are completed, the remaining known pipeline integrity and exposures repairs will then be completed.

Clean imported fill material or in-situ soil material excavated at the project locations will be used for pipeline protection activities and road repairs. The use of articulated concrete mats and variable sized rock rip-rap will also be discharged as fill material into waters of the U.S. for pipeline protection and creek bank stabilization and erosion repair. Approximately 2,100 cubic yards of in-situ cut material will be used for fill at pipeline exposure and road repair locations. Approximately 3,600 cubic yards of engineered fill material will be imported for fill at pipeline exposure and maintenance road repair locations. Project plans include locations specified as E (1-18) and R (1-12). The letter E indicates a pipeline exposure location and the letter R indicates a road repair. These specific locations are labeled on Figure 3, Current Known Repair

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Areas (see Attachment C).

#### 1) Currently Planned Project Pipeline Exposure and Integrity Digs

Pipeline exposures: The proposed project includes the repair of 22 pipeline exposures. These are mostly a result from flood flows during large storm events. Maintenance repairs of pipeline exposures include the use of articulated concrete mats and ungrouted vegetated riprap bank protection that will provide for the protection of exposed pipelines in water ways while maintaining creek flows and facilitating the establishment of native riparian vegetation. Projects to repair exposed pipeline projects involve excavating a section of exposed pipeline to inspect for damage, repairing the pipe wrap, and installing pipeline protection structures including articulated concrete mats and riprap bank protection. These repairs are identified in the project plans titled Southern California Gas Lines 407 and 3003, Sullivan Canyon (Psomas, November 2008).

Pipeline integrity correlation/inspection digs and repairs: The proposed project includes three pipeline integrity correlation/inspection digs and repairs to investigate anomalies identified as part of pipeline integrity program. This investigation will comply with the requirements of the DOT and CPUC, including the Pipeline Safety Improvement Act, 49 U.S.C. § 60101, et seq. One pipeline integrity dig is located at pipeline exposure E-18 and will occur at the same time as a pipeline exposure repair to minimize impacts at this location. The other two pipeline integrity digs (PIP #2 & #3 will require excavation, inspection, and repair at locations not associated with pipeline exposures. To accomplish these inspections/repairs, SoCalGas will excavate the pipeline, remove pipe wrap, and visually inspect the pipeline. If repairs are required, then SoCalGas would perform these repairs while the excavation is open, incurring no further impact to the area. Excavations are anticipated to be approximately 40 feet long, by 15 feet wide, to approximately two feet below the pipeline.

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#### 2) Currently Planned Road Repair

The maintenance road has experienced severe degradation from flood flows and hillside erosion. In addition to 15 specific road repair locations, identified in project plan Southern California Gas Lines 407 and 3003, Sullivan Canyon (Psomas, November 2008), the existing maintenance road will be repaired and maintained as a 12-foot wide road with periodic turnouts needed for allowing two-way maintenance vehicle traffic to pass or turn around. The purpose of the maintenance road is to provide regular inspection access over all portions of the pipeline system using on-the-ground visual inspection while driving a truck.

Articulated concrete mats and ungrouted rip-rap planted with riparian vegetation will be used where the integrity of the road is subject to erosion from creek flows (See Attachment 2, Figure 5 for reference photos. Refer to Attachment 2, Figures 6 and 7 for representative site photos of the repair areas.)

#### 3) Ongoing Routine Maintenance Activities

The following is a list of maintenance actions that must be routinely conducted within Sullivan Canyon to safely maintain the pipeline system and maintenance road and which are covered by this certification. The actions described below are regulated by the DOT and/or CPUC and are considered safety related actions. Many of these actions are conducted on a specific schedule.

Pipeline Inspection. Pipeline inspection will be regularly conducted over all portions of the pipeline system using on-the-ground visual inspection while driving a truck. Inspections include the pipelines, maintenance roads, and support facilities. Operating personnel will check and record pipeline conditions, replace missing or damaged pipeline markers and patrol signs, assure that pipeline markers are clearly visible, perform minor maintenance activities, and record any conditions that may affect pipeline operations.

Damage Prevention. Surveillance (i.e. locating and marking of pipelines and facilities) will be conducted to ensure no damage is caused by third party excavation or construction activities.

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Leakage Surveys. Gas leak surveys will be conducted using hand-held leak testing equipment. These surveys will be conducted once each year, or more if necessary. A pickup truck and 1-2 crew members are typically required to complete this type of survey. No ground disturbance or vegetation clearing is required for this activity.

Cathodic Protection Surveys. Cathodic protection surveys will be completed bi-monthly to determine pipe and soil electrical potentials. Cathodic protection prevents metal corrosion by making the pipeline surface a cathode as in an electrochemical cell. Simple testing instruments are needed, and due to the length of the canyon, surveys may require 10 days to complete. Testing instruments connect to existing Electrolysis Test Stations (ETS) that are attached to the pipelines within the canyon. No ground disturbance or vegetation clearing is required for this activity.

Unscheduled Maintenance. Unscheduled maintenance and inspection may be initiated as a result of conditions encountered during normal maintenance activities. Unscheduled maintenance may also include special patrols conducted after heavy rains, fires, or other natural disasters to assess damage to maintenance roads and facilities and to insure that underground pipe has not been exposed as a consequence of erosion. Personnel will also inspect for subsidence that may threaten to wash out a pipeline. Because most of this work is unscheduled, it is not possible to accurately predict the number of hours necessary for completion or the dates of each activity. Various surveys may also include Close Interval Copper Sulfate Surveys or Atmospheric Corrosion Control Surveys.

Maintenance Road Repairs. Road maintenance will include grading of the existing maintenance road and spot-repair of erosion sites subject to scouring to allow for the passage of inspection vehicles. This will be done as necessary, usually following seasonal rains. The area of repair will be limited to the width of the maintenance road (approximately 12 feet wide).

Vegetation control. Where practical, the use of integrated pest management controls such as mechanical removal (i.e. grass mowing, weed whipping, or other mechanical methods) will be employed before using pesticides. Where these methods are not practical such as over large areas, pesticide application will occur. Pesticide use for purposes of this plan typically refers to

