

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking on the Commission's Own  
Motion to Adopt New Safety and Reliability  
Regulations for Natural Gas Transmission and  
Distribution Pipelines and Related Ratemaking  
Mechanisms.

Rulemaking 11-02-019  
(Filed February 24, 2011)

**NATURAL GAS SYSTEM OPERATOR SAFETY PLAN  
OF WILD GOOSE STORAGE, LLC**

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Dated: June 29, 2012

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In accord with Ordering Paragraph 5 of Decision 12-04-020 of the California Public Utilities Commission (Commission) and Section 961(b) of the California Public Utilities Code, Wild Goose Storage, LLC (Wild Goose) submits its Natural Gas System Operator Safety Plan (Safety Plan).

**I. INTRODUCTION**

Wild Goose achieved the status of being the first independent storage provider in California in June 1997, upon receiving its certificate of public convenience and necessity from the Commission.<sup>1</sup> At that time, Wild Goose became authorized to provide firm and interruptible storage services from storage facilities to be constructed in Butte County, California. Since that time, Wild Goose has twice received Commission authorization to expand the size of its storage facility,<sup>2</sup> such that the Wild Goose facility currently has an inventory capacity 50 Bcf, with peak injection capacity of 650 MMcf/d and peak withdrawal capacity of 1,200 MMcf/d.

As an independent storage provider operating in California, Wild Goose falls within the

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<sup>1</sup> See Commission Decision 97-06-091.

<sup>2</sup> See Commission Decision 02-07-036 and Decision 10-12-025.

Public Utilities Code definition of natural gas corporation<sup>3</sup> and thus is subject to the Code's requirement to develop and submit for Commission approval "a plan for the safe and reliable operation of its commission regulated gas pipeline facility."<sup>4</sup>

## II. SAFETY PLAN

The attached Table of Concordance (Table) (Attachment A) and supporting documentation<sup>5</sup> set forth Wild Goose's comprehensive Safety Plan, which, through its various elements demonstrates, consistent with Public Utilities Code Section 963(b) (3), that Wild Goose places the safety of the public and its employees as its top priority. In this regard, the Safety Plan achieves each of the specific criteria required in Public Utility Code §§961 (c) and (d) (1-10) as outlined on pages 16 and 17 of Decision 12-02-024. The Safety Plan is consistent with industry best practices and with federal pipeline safety statutes as set forth in Chapter 601 of Subtitle VIII of United States Code Title 49 and the implementing regulations adopted by the United States Department of Transportation. Moreover, Wild Goose maintains a rigorous schedule for the periodic review and updating of the Safety Plan as is further outlined at Section I of the Table.

As noted in the Decision (at pp. 19-20), Public Utilities Code Section 961(e) provides that the Commission require each gas corporation to "provide opportunities for meaningful,

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<sup>3</sup> California Public Utilities Code Section 222.

<sup>4</sup> *Id.*, Section 961.

<sup>5</sup> The following documents, which contain the primary elements of the Safety Plan, are submitted, in addition to the attached Table as Attachments (B through F), for ease of reference:

1. Emergency Response Plan;
2. Integrity Management Plan;
3. Environmental Health and Safety Handbook for US Operations
4. Public Awareness Program; and
5. Anti-Drug and Alcohol Misuse Prevention Plan.

substantial, and ongoing participation by the gas corporation workforce in the development and implementation of the plan, with the objective of developing an industry-wide culture of safety that will minimize accidents, explosions, fires, and dangerous conditions for the protection of the public and the gas corporation workforce.” To implement this code section, the Decision requires that (1) “each gas corporation make its safety report available to its workforce, and provide for comments and suggestions from the workforce,” (2) “ gas system operators shall retain a log of the comments and suggestions, including the disposition of the comment or suggestion, with a summary of the rationale for the disposition,” (3) the gas system operators inform their employees that any employee who perceives a breach of safety requirements may inform the Commission of the breach, and that the Commission will keep the identity of the employee confidential. With respect to this last requirement, each gas operator must inform its workforce as to the manner by which to submit such information to the Commission.

In conformance with these requirements, Wild Goose provides meaningful, substantial and ongoing employee participation in the development and implementation of its Safety Plan (as outlined in Section 3 of the Table). Moreover, Wild Goose’s Public Awareness Program (PAP), which has been approved by the Commission’s Gas Safety and Reliability Branch, details Wild Goose’s commitment to its policy that the safety of the public and its employees are its top priority. Finally, for the purpose of reporting perceived safety violations to the Commission, Wild Goose confirms that it has provided its employees with the contact coordinates of the Director of the Commission’s Consumer Safety and Protection Division and the designation “Safety Breach Notification from Gas System Operator Employee-Confidentiality Requested.” In addition, this information has been posted in a public area at the Wild Goose facility.

As set forth in this submission, Wild Goose's Safety Plan is currently fully implemented. Wild Goose awaits further direction from the Commission as to any necessary modifications.

### III. CONCLUSION

Wild Goose looks forward to working with the Commission on the review, approval and further implementation of the Safety Plan.

Respectfully submitted June 29, 2012 at San Francisco, California.

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**ATTACHMENT A**

**Wild Goose System Operator Safety Plan - Table of Concordance**

**Wild Goose System Operator Safety Plan - Table of Concordance  
California Public Utility Codes §§ 961 and 963**

	<b>PUBLIC UTILITY CODE:</b>	<b>TOPIC:</b>	<b>RESPONSE:</b>
Section 1	961.(b)(4)	Periodic review and update of the Safety Plan*	<ul style="list-style-type: none"> <li>• Wild Goose reviews its Emergency Response Plan (ERP) on an annual basis, in the first quarter of each calendar year. Wild Goose engages Shepard Risk and Safety Advocates of Indio, California to assist in the review and update. Updated hard copies of the ERP are couriered to all relevant parties identified within the ERP, including the Commission.</li> <li>• The Integrity Management Plan (IMP) is reviewed each year in June and updates are immediately couriered to Niska Operations/Engineering groups. Operator Qualifications are reviewed and updated accordingly every three years, including the Department of Transportation (DOT) required training. This is outlined in the training matrix attached and marked as Appendix A.</li> <li>• Other documents that form part of the Safety Plan, as identified in this submission, are updated as required.</li> </ul>
Section 2	<b>List of Issues from Pub. Util. Code §§ 961 (c) and (d) (1-10) (as per Decision 12-04-010)</b>		
	<p>Identify and minimize hazards and systematic risks. 961(d)(1)</p> <p>Identify the safety-related systems that will be deployed to minimize hazards. 961(d)(2)</p>	Safety Systems	<p>Wild Goose maintains numerous Safety Systems designed to identify and minimize hazards and systematic risks, including:</p> <ul style="list-style-type: none"> <li>• IMP page 5/section 2 - Pipeline System Description: the pipeline system is maintained in compliance with 49 CFR Part 192 and was placed under cathodic protection shortly after commissioning</li> <li>• IMP page 17/section 5.4 - Condition Discovery and Remediation Schedule: integrity assessments in accordance with this section help prioritize and evaluate remediation of anomalous conditions; reductions in operating pressure are determined using ASME/ANSI B31G or AGA Pipeline Research Committee Project PR-3-805 and notifications are made to the Pipeline and Hazardous Materials Safety Administration and the Commission Utilities Safety and Reliability Branch as required</li> <li>• IMP page 19/section 6 - Preventive and Mitigative Measures: provides detailed measures to protect high consequence areas and to enhance public safety,</li> </ul>

**Wild Goose System Operator Safety Plan - Table of Concordance  
California Public Utility Codes §§ 961 and 963**

			<p>including measures for outside force damage threats, corrosion threats and the need for automatic shut-off or remotely operated valves</p> <ul style="list-style-type: none"> <li>• IMP page 20/section 7 - Program Management: performance measures are reported and submitted to PHMSA by March 15 of each year; Program Management also includes Record Keeping, Management of Change and Internal and External Communications</li> <li>• IMP page 23/section 8 - Quality Assurance: includes the appropriate documentation, training, assigned responsibilities, program reviews and audits to ensure success and continued improvement of the IMP</li> <li>• Wild Goose has an online database, accessible by all employees, detailing all hazardous materials used in its operations</li> <li>• Section 12 of the ERP deals extensively with Hazardous Materials Information</li> </ul>
	<p>Equipment and personnel procedures to limit the damage from accidents. 961(d)(5)</p> <p>Timely response to reports of leaks, hazardous conditions, and emergency events. ( 961(d)(6)</p> <p>Prepare for and respond to earthquakes and other major events. 961(d)(8)</p>	<p>Emergency Response</p>	<p>Wild Goose has a comprehensive Emergency Response Plan and provides extensive training to its employees to ensure that the response to any emergency or abnormal situation is answered in a timely and effective manner:</p> <ul style="list-style-type: none"> <li>• Section 7.0 - Niska Facility Sample Response Strategies of the ERP provides emergency response procedures including strategies for: <ul style="list-style-type: none"> <li>- Loss of Well Control (7.2)</li> <li>- Pipeline Rupture (7.3)</li> <li>- Escaping Gas (7.4)</li> <li>- Natural Disasters (7.5)</li> <li>- Major Fires and Explosions (7.6)</li> </ul> </li> <li>• The ERP includes extensive evacuation procedures to ensure the timely and effective evacuation of residents within the Emergency Planning Zone and to limit damage from accidents to equipment and personnel</li> </ul>



**Wild Goose System Operator Safety Plan - Table of Concordance**  
**California Public Utility Codes §§ 961 and 963**

			<ul style="list-style-type: none"> <li>• Section 6.0 - Site Specific Information of the ERP includes site specific emergency response information including: <ul style="list-style-type: none"> <li>- Emergency Control Systems (6.1.2)</li> <li>- Emergency Communications (6.1.3)</li> <li>- Safety Equipment (6.1.4)</li> <li>- Hazardous Materials Storage (6.1.5)</li> <li>- High Consequence Area (6.1.10)</li> <li>- Emergency Planning Zones (6.1.11)</li> </ul> </li> <li>• In conjunction with our ERP, section 3 of the IMP provides for an Identification Method for High Consequence Areas and section 4 deals with Threats, Data Integration and Risk Assessment</li> <li>• Our Environmental Health and Safety Handbook for US Operations (Handbook) provides for: <ul style="list-style-type: none"> <li>Emergency Response Planning and Reporting (section 5)</li> <li>Identification (section 6)</li> <li>Control (section 6)</li> </ul> </li> </ul>
	<p>Protocols for determining maximum allowable operating pressures. 961(d)(7)</p> <p>Meet or exceed the minimum standards for safe design, construction, installation, operation, and maintenance of gas transmission and distribution facilities prescribed by regulations. 961(d)(9)</p> <p>Best practices in the gas industry and with federal pipeline safety statutes. 961(c)</p>	<p>State and Federal Regulations</p>	<p>During design stage of the project, Niska determines what pressure is best suited for the operation. This is based on:</p> <ul style="list-style-type: none"> <li>• Maximum operating pressure of reservoir, staying within Division of Oil, Gas and Geothermal Resources pressure gradient requirement</li> <li>• Maximum operating pressure of the transmission system that the new facility will be tied into, which for California has been Pacific Gas and Electric Company</li> <li>• Hydraulic study of various piping size systems is performed by third party professional engineering firm to determine pressure loss in system, and operating pressure/ temperature requirements for piping/ equipment to satisfy needs</li> </ul>

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			<ul style="list-style-type: none"> <li>• The optimum sized equipment, and piping size is selected. The pressure at which this equipment / pipe will operate at is confirmed</li> </ul> <p>A professional engineering firm utilizes this information to determine pipe specification requirements to safely satisfy the maximum allowable operating pressure (MAOP). They look closely at pipe classification, crossings, pipe stresses, hydrotest requirements, terrain/ environment, and other criteria for which the pipe will be utilized, to ensure proper design detail is applied to the MAOP calculation (49CFR192). This in turn, ensures that the required pipe specifications/ wall thickness is selected for all sections of the pipe.</p> <p>Wild Goose complies with all state and federal regulations including:</p> <ul style="list-style-type: none"> <li>• California Public Utilities Code</li> <li>• Department of Transportation (DOT) Regulations</li> <li>• Pipeline and Hazardous Materials Safety Administration</li> <li>• Department of Transportation, Commission and any permitting agency that could require some pipeline/ safety related actions as part of the condition for permit</li> <li>• We utilize GTS Engineering and Consulting services to update the IMP, and perform annual IMP review;</li> </ul> <p>Wild Goose’s commitment to best practices is also stated in the Environmental Health &amp; Safety Policy Statement at page 5 of the Handbook.</p>
	<p>Safety of the public and gas corporation employees as the top priority, take all reasonable and appropriate actions consistent with the principle of just and reasonable cost-based rates.            963(b)(3)</p> <p>Provide adequate storage and transportation capacity</p>	<p style="text-align: center;">Continuing Operations</p>	<p>Our Public Awareness Program (PAP) has been submitted and approved by the Commission and complies with the American Petroleum Industry Public Awareness Programs for Pipeline Operators Recommended Practice and is designed to enhance public environmental and safety property protection through increased public awareness.</p> <p>The PAP focuses on safety communication to four main groups: residents; emergency response officials; public officials and excavators and will provide the public, appropriate government organizations, persons engaged</p>

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	<p>to reliably and safely deliver gas to all customers. 961(d)(3)</p> <p>Provide for effective patrol and inspection to detect leaks.</p> <p>Ensure an adequately sized, qualified, and properly trained gas corporation workforce. 961(d)(10)</p>		<p>in excavation, public/private utility companies, and related activities with information on how to identify the location of underground pipelines owned and operated by Wild Goose and how to recognize and report a natural gas pipeline emergency.</p> <ul style="list-style-type: none"> <li>• ERP Section 8 - outlines the communication plan to the affected public in the event of an emergency</li> <li>• Employees attend extensive training and orientation on Wild Goose operations and environmental and safety matters; this orientation given by the Environment Health &amp; Safety Coordinator in accordance with Section 1.0 of the Handbook</li> <li>• Employees are required to comply with numerous policies, procedures and guidelines in place to ensure that safety is the top priority, these include but are not limited to: <ul style="list-style-type: none"> <li>- Anti-Drug and Alcohol Misuse Prevention Plan developed in accordance with the DOT and acknowledged by each employee at Section VIII. Appendix A – Acknowledgement/Receipt Form</li> </ul> <p>And in accordance with the Handbook:</p> <ul style="list-style-type: none"> <li>- Incident Reporting and Investigation</li> <li>- Near Miss Reporting</li> <li>- Energy Isolation</li> <li>- Gas Detection Practices</li> <li>- Hazard Assessment and Control Practice</li> <li>- Safe Trenching and Shoring Practices</li> <li>- Confined Space Entry</li> <li>- Pipeline Purging Practices</li> <li>- Safety Work Permit System, including Hot Work</li> </ul> </li> <li>• The Engineering and Operations group monitors reservoir capacity, well behavior, and pipeline/ plant operating conditions on a regular basis. They also are in communication with the transmission company daily to check on their system pressures, hydraulics, etc. Any bottlenecks or deficiencies are quickly identified and rectified. The Operations</li> </ul>
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**Wild Goose System Operator Safety Plan - Table of Concordance  
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			<p>group implements a preventative maintenance program to reduce risk of equipment failure, ensuring reliability is high. Flow performance curves are generated that reflect overall facility capability at various levels of reservoir inventory.</p> <ul style="list-style-type: none"> <li>• IMP page 9/section 4 - details the process for threats and detection of leaks including time dependent threats; static or resident threats; time-independent threats or any additional threats</li> <li>• Wild Goose's manpower plan is reviewed annually by Human Resources with the cooperation of operations</li> <li>• Wild Goose ensures that all employees are training in the appropriate areas, in a timely manner and by the appropriate trainer in accordance with the attached training matrix, marked as Appendix B</li> </ul>
Section 3	§961(e)	Opportunities for participation in the Safety Plan	<p>Wild Goose is committed to ensuring an engaged and responsive workforce to maintain the highest safety environmental standards, examples include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Confidence Line - a well publicized third party communications program that allows employees to anonymously report sensitive work related issues</li> <li>• EHS Handbook - offers an extensive resource for employees on environmental and safety issues including: <ul style="list-style-type: none"> <li>- Health and Safety Meetings</li> <li>- Health and Safety Responsibilities</li> <li>- General Safety Practices</li> <li>- Work Site Safety Practices</li> <li>- Other Safety Practices</li> </ul> </li> <li>• Employees actively participate in the update and maintenance of TIPS (Training Information Practice System) providing over 100 safe work procedures, including equipment operation safety and standards, on an accessible share drive</li> </ul>

## **APPENDIX A**

### **Table of Concordance: Operator Qualifications Matrix**

Appendix A to the Wild Goose System Operator Safety Plan - Table of Concordance: Operator Qualifications Matrix

California Public Utility Codes	RE-EVALUATION PERIOD	Stacy Brackin		Grant Bozarth		Justin Jaramillo		Lee Killough		Dana Moffett		Daniel Pleger*	
		QUAL DATE	Test	QUAL DATE	Test	QUAL DATE	Test	QUAL DATE	Test	QUAL DATE	Test	QUAL DATE	Test
CP Survey	3	3/14/2012	3/11/2012				3/7/2012		2/29/2012	3/8/2012	2/27/2012		
Rectifier Inspection	3	1/23/2012	2/10/2012	2/2/2012		1/20/2012	3/7/2012		2/29/2012	3/14/2012	2/27/2012		
Rectifier Maintenance	3	1/23/2012	1/25/2012										
External Pipe Surface Inspection	3	3/14/2012	3/11/2012	3/6/2012		3/6/2012	3/7/2012	3/6/2012	3/6/2012	3/8/2012	2/27/2012		
External Coatings Application & Repair	3	3/14/2012	3/11/2012						3/6/2012	3/8/2012	3/14/2012		
Line Markers	5	1/12/2012	2/10/2012	3/6/2012		3/6/2012	3/7/2012	3/6/2012	2/29/2012	3/6/2012	3/7/2012	12/14/2007	
Patrols & ROW Inspections	5	1/30/2012	2/10/2012			3/8/2012	3/8/2012	3/8/2012	2/29/2012	3/8/2012	2/27/2012	12/13/2007	
Navigable Waterway Crossing Inspection	3	3/14/2012	3/10/2012						3/6/2012	3/8/2012	3/7/2012		
Marking & Locating Prior to Excavation	3	1/27/2012	2/10/2012	1/14/2012		1/26/2012	3/7/2012	1/26/2012	2/29/2012	3/14/2012	2/27/2012	12/14/2007	
Inspection After Excavation & Leak Survey After Blasting	3	3/14/2012	3/11/2012							3/8/2012			
Maintain Valves	3	1/19/2012	2/10/2012			3/8/2012	3/7/2012	3/8/2012	3/6/2012	3/8/2012	3/14/2012	12/13/2007	
Valve Inspection	3	3/14/2012	2/10/2012			3/8/2012		3/8/2012		3/8/2012		12/13/2007	
Repair Valves	3	N/A	N/A										
Test remote shut-down	3	3/14/2012	2/13/2012			3/5/2012	3/7/2012	12/11/2007	3/6/2012	3/5/2012	3/7/2012	12/14/2007	
Maintaining Critical Valves - Distribution / Transmission	3	1/19/2012	2/10/2012	1/21/2012			1/20/2012	1/19/2012					
Periodic Checking Of Odorant / Detector Tube test only	3	1/23/2012	1/25/2012				1/25/2012	1/24/2012	2/29/2012				
Pressure Vessel Inspection & Repair	3	N/A	N/A										
Security for Pipeline Facilities	5	1/23/2012	2/10/2012	2/2/2012		1/25/2012	3/7/2012	2/7/2012	2/29/2012	1/26/2012	2/27/2012		
Pig Launchers/ Receivers	3	3/14/2012	3/10/2012			1/26/2012		1/26/2012	3/6/2012	3/14/2012	3/7/2012		
Purging and Air Movers	3	2/13/2012	2/13/2012			3/5/2012	3/8/2012		2/29/2012	3/8/2012	3/14/2012		

6/27/2012

California Public Utility Codes	RE-EVALUATION PERIOD	Stacy Brackin		Grant Bozarth		Justin Jaramillo		Lee Killough		Dana Moffett		Daniel Pleger*	
		QUAL DATE	Test	QUAL DATE	Test	QUAL DATE	Test	QUAL DATE	Test	QUAL DATE	Test	QUAL DATE	Test
Operations of a Pipeline System	3	1/23/2012	1/24/2012	2/8/2012		3/8/2012	1/25/2012	2/7/2012		3/8/2012	2/27/2012	12/14/2007	
Control Room Operations of a Pipeline	3	1/30/2012	1/25/2012	2/8/2012		1/24/2012	3/8/2012	2/7/2012	3/6/2012	1/25/2012	2/27/2012		
CPM Leak Detection	3	N/A	N/A			3/8/2012		3/8/2012					
Gas Leak Survey	3	11/6/2008	3/10/2012				3/7/2012	12/11/2007	2/29/2012	3/8/2012	3/14/2012	12/14/2007	
Prevention of Accidental Ignition	3	3/14/2012	3/11/2012			3/8/2012	3/7/2012	3/8/2012	3/6/2012	3/8/2012	3/7/2012		
Compressor Station Startup & Shutdown	3	1/23/2012	2/10/2012	2/8/2012		1/24/2012	3/7/2012	1/25/2012	3/6/2012	1/25/2012	3/7/2012	12/13/2007	
Operations of a pipeline system	3	1/24/2012	2/13/2012	2/8/2012		1/24/2012		12/12/2007	3/6/2012	12/13/2007		12/13/2007	
Gas Detection and Alarms	3	3/14/2012	2/10/2012				3/7/2012	12/12/2007	2/29/2012	3/14/2012	3/7/2012	12/13/2007	
AOCs	3							12/10/2007		12/13/2007		12/13/2007	
Leak Survey	3	3/14/2012	3/10/2012			5/10/2011							
													*This employee no longer operates

6/27/2012

## **APPENDIX B**

### **Table of Concordance: Operator Training Matrix**



Appendix B to the Wild Goose System Operator Safety Plan - Table of Concordance: Wild Goose Training Matrix

Topic	Initial Class	Refresher Class	Applies to	Federal Requirement	California Requirement	Trainer
Back Injury Prevention	yes	as needed	All employees	NA	NA	External Consultant = Safety Tactics
Bloodborne Pathogens (Infection Control)	yes	annually	All employees	29 CFR 1910.1030(e)(5), (g)(2)	8 CCR 5193(5)(C)	Kelly Baltimore
Confined Space Awareness	yes	updates	All employees	29 CFR 1910.146	8 CCR 5157(g)	Kelly Baltimore / External Consultant = Safety Tactics
Control Room Mgmt	yes	updates	All employees	29 CFR 192.631		External Consultant = Safety Tactics
Cranes / Hoisting	yes	as needed				External Consultant = Safety Tactics
Defensive Driving	yes	Every 3 Years	All employees	Best Practice	Best Practice	External Consultant = Safety Center
Drug and Alcohol Abuse/Misuse - Supervisor	yes	as needed	All employees			External Consultant = Safety Tactics
Electrical Safety - Basic awareness	yes	annually	All employees			External Consultant = Safety Tactics
Emergency Reponse	Yes	annually	All employees	No requirement.	Title 8, 3220	Kelly Baltimore
Excavation and Trenching	yes	annually	All employees			Kelly Baltimore / External Consultant = Safety Tactics
Fall Protection / Work from heights > 6'	yes	annually	All employees			Kelly Baltimore / External Consultant = Safety Tactics
Fire Extinguisher (portable) or other fire fighting equipment	yes	annually	All employees	29 CFR 1910.157(g)	8 CCR 6151(g)(1)	External Consultant- Simplex Grinnell
Fire Protection and Prevention	yes	annually	All employees			External Consultant- Simplex Grinnell
First Aid /CPR / AED	yes	2 years	All employees	29 CFR 1910.151	8 CCR 3400(b), 6251	External Consultant = Zee Medical
First Responder Awareness/Operations	yes	annually	All employees	29CFR 1910.120 (q)	CCR Title 8 Sec. 5192 (Q) (4)	External Consultant = Safety Tactics
Forklift Operator	yes	3 years	F/L Operators	29 CFR 1910.178(i)	Title 8 3657; 3664; 3668	External Consultant = Safety Tactics
Forklift Safety	yes	3 years or sooner as needed	F/L Operators		Title 8 3657; 3664; 3668	External Consultant = Safety Tactics
Ground Disturbance	yes	TBD	All employees			Kelly Baltimore
Hazard Communication	yes	as needed	All employees	Title 8 5194		External Consultant = Safety Tactics
Haz Mat Trans & Air Shipper	yes	3 years	Operators			External Consultant = Lyon's
HAZWOPER and Butte County HMRRP	yes	annually	All employees	29 CFR 1910.120(q)(6)	8 CCR 5192(q) (6) and 19 CCR 2620 et seq.	External Consultant
HAZWOPER REFRESHER	yes	annually	All employees	29 CFR 1910.120		Online
Hearing Conservation	yes	annually	All employees	29 CFR 1910.95	8 CCR 5099	Kelly Baltimore
Heat Stress	yes	annually (in spring)	All employees	No requirement	8 CCR 3395	Kelly Baltimore
Injury & Illness Prevention Plan	yes	annually	All employees	No requirement.	8CCR 3203	External Consultant
Incident Investigation	yes	annually	Supervisors		8CCR 3203	Kelly Baltimore / External Consultant = Safety Tactics
Ladders	yes	as needed	All employees	29 CFR 1926.1053		Kelly Baltimore / External Consultant = Safety Tactics
Lock out / Tag out	yes	annually	All employees		CCR Title 8 3314	Kelly Baltimore / External Consultant = Safety Tactics
Machine Guarding	yes	as needed	All employees	29 CFR 1910.212		Kelly Baltimore / External Consultant = Safety Tactics
Noise Exposure	yes	annually	All employees	29 CFR 1926.52	Title 8 5097-5099	Kelly Baltimore / External Consultant = Safety Tactics
O&M Manual	yes	initial	All employees	29 CFR 192		External Consultant
Overhead Powerline Safety	yes	as needed	All employees		CCR Title 8, 2946 - 2949	Kelly Baltimore / External Consultant = Safety Tactics
Personal Protective Equipment	yes	as needed	All employees	29 CFR 1910.132	CCR Title 8 3380	Kelly Baltimore / External Consultant = Safety Tactics
Purging Code	yes	TBD	All employees			Kelly Baltimore / External Consultant = Safety Tactics
Respiratory Protection	yes	annually	All employees	29 CFR 1910.134	CCR Title 8 5144	Kelly Baltimore
Respiratory Medical Clearance and Fit test	yes	annually	All employees	29 CFR 1910.134 (e) (5)	CCR Title 8 5144	External Consultant
Underground Storage Tanks (UST)	yes	annually	Operators	No requirement.	23 CCR 2715(a)-(f)	WGS employee - certified UST Operator
Welding and Cutting	yes	as needed	Welders, employees working in the area	29 CFR 1926.350, 351	CCR Title 8 1537; 4799; 4848	External Consultant = Safety Tactics