



March 10, 2014

Ms. Linda Daugherty
Director, Central Region
Pipeline and Hazardous Materials Safety Administration
901 Locust Street, Suite 462
Kansas City, MO 64106

RECEIVED MAR 11 2014

Re: Notice of Amendment CPF 3-2014-1001M

Dear Ms. Daugherty:

This is in reply to your letter of February 12th, 2014 addressed to Kevin Rumbelow, Vice President of Supply Chain, setting forth Notice of Amendment arising out of your staff's review of the AmeriGas Operation & Maintenance Manual (O&M) Public Awareness Section during an October 24th, 2012 audit. Your letter was referred to me for response.

Notice of Amendment

On the basis of the inspection, PHMSA has identified the inadequacies found within AmeriGas's plans or procedures, as describe below:

1. 192.615 Emergency Plans.

- (a) Each operator shall establish written procedures to minimize the hazard resulting from a gas pipeline emergency. At a minimum, the procedures must provide for the following:
- (1) Receiving, identifying, and classifying notices of events which require immediate response by the operator.
 - (2) Establish and maintaining adequate means of communication with appropriate fire, police, and other public officials.
 - (3) Prompt and effective response to a notice of each type of emergency, including the following:
 - i. Gas detected inside or near a building.
 - ii. Fire located near or directly involving a pipeline facility.

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- iii. Explosion occurring near or directly involving a pipeline facility.
- iv. Natural disaster.

AmeriGas's public awareness program is inadequate because the emergency call number does not provide all AmeriGas customers, including its Heritage Propane subsidiary, the availability to get a prompt and effective response to emergencies the entails sufficient information on recognizing and responding to a leak.

In addition, the availability of an emergency call number is not required as part of the PAP inspection but it conflicts with 49 CFR 192.615 (a) (3).

Response

AmeriGas has been working towards unification of the AmeriGas Emergency Call Center (ECC) by integrating the Heritage Propane locations into the AmeriGas ECC. Year to date, AmeriGas has integrated 267 out of 407 Heritage Propane locations into the AmeriGas ECC. The remaining 140 locations are scheduled to be integrated by May of 2015.

As of March, 7th 2014 the AmeriGas location addressed in the above Notice of Amendment OPS system has been deactivated and abandonment procedures are in place on the jurisdictional pipeline system. This was the last jurisdictional pipeline system AmeriGas operated in the State of Missouri. Therefore AmeriGas no longer operates jurisdictional pipeline systems in the state of Missouri.

Thank you for your consideration in this matter. Please do not hesitate to contact me at 904-716-3006 or by email to mike.mclean@amerigas.com if you or your staff have any questions or require additional information.

Sincerely,



Michael McLean

AmeriGas OPS Corporate OPS Compliance Manager