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January 2, 2020

**Via Overnight Delivery Service**

Robert Burrough  
Director, Eastern Region  
Pipeline and Hazardous Materials Safety Administration  
840 Bear Tavern Road, Suite 300  
West Trenton, NJ 08628

**Re:** UGI Energy Services, LLC

**Temple LNG Facility – Response to Notice of Probable Violation Letter**

Dear Mr. Burrough:

This letter constitutes the formal response of UGI Energy Services, LLC (“UGIES”) to your letter on behalf of the Pipeline Hazardous Materials and Safety Administration (“PHMSA”) dated December 5, 2019 (the “December 5 Letter”), asserting one probable violation related to UGIES’ manual of procedures and requiring UGIES to undertake certain manual revisions, with respect to the Temple LNG Facility operated by UGI LNG, Inc. in Berks County Pennsylvania.

The December 5 Letter specifically asserts that UGIES’ Operations Manual violated 49 CFR §193.2605 by not including provisions for performing adequate atmospheric corrosion inspections, insofar as it does not provide for the inspection of steel components behind visual barriers such as piping under thermal insulation or resting on pipe supports, along with any areas under disbanded coating.

Following the PHMSA inspection in question, conducted in July of 2017, UGIES’ plant personnel did update the Operations Manual to include provisions for inspecting piping under thermal insulation in the following manner:

**Inspection Criteria:**

Systems (pipe or support) with protective coating shall be visually inspected to detect any loss of integrity in the coating system. For insulated piping system, test ports along the horizontal runs of the piping system shall be removed to complete this visual inspection. Such corrosion indicators such as; cracking, peeling, bubbling or pitting of the protective coatings are suggestions of an abnormal condition. Such conditions shall be logged for further evaluation.

However, since the December 5 Letter makes clear PHMSA’s position that UGIES’ procedures must explicitly speak to inspecting steel components hidden by *any visual barriers*,

**Robert Burrough, Director**  
**Eastern Region – PHMSA**  
**January 2, 2020**  
**Page 2**

UGIES agrees to further amend its procedures and provide them to PHMSA within 90 days of receipt of PHMSA's Final Order.

Please contact me at (610) 373-7999, ext. 1173 if you have any additional questions regarding this response.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Dante D' Alessandro". The signature is fluid and cursive, with a large initial "D" and "A".

Dante D' Alessandro  
Vice President – Engineering and Operations

Enclosures

1. PHMSA NOPV Letter Dated December 5, 2019