



Allan Beshore
Director, Central Region, OPS
Pipeline and Hazardous Materials Safety Administration,

Re: CPF 3-2019-0002M
July 10, 2019

Dear Mr. Beshore,

Please review the following responses to the items listed on CPF 3-2019-0002M.

1. §192.614 Damage prevention program.
(a) Except as provided in paragraphs (d) and (e) of this section, each operator of a buried pipeline must carry out, in accordance with this section, a written program to prevent damage to that pipeline from excavation activities. For the purposes of this section, the term "excavation activities" includes excavation, blasting, boring, tunneling, backfilling, the removal of aboveground structures by either explosive or mechanical means, and other earthmoving operations.

Ferrellgas' procedures failed to state how locates performed by personnel were to be documented and maintained. PHMSA's inspection found no documentation of the locates performed by personnel was being kept. The technician was calling back to the office and just relating that the locates had been performed but no records were made. A review of Ferrellgas' procedure showed no documentation of locates was specified. Ferrellgas must amend its procedures to specify recording and maintenance of this action taken to locate its facilities for damage prevention.

Response:

The procedure is currently outlined in Section 1, Page 60 of the current O&M Manual. We will amend that to include a more detailed procedure for documentation of that activity. This will be completed by September 30th, 2019

2. §192.805 Qualification program.
Each operator shall have and follow a written qualification program. The program shall include provisions to:
 - (a) -----
 - (b) Ensure through evaluation that individuals performing covered
 - (c) tasks are qualified;



§192.803 Definitions.

Qualified means that an individual has been evaluated and can:

(a) ----

(b) **Recognize and react to abnormal operating conditions.**

Ferrellgas' written qualification program fails to identify any reaction to abnormal operating conditions. Their program identifies abnormal operating conditions but does not state an appropriate reaction. Ferrellgas must amend its written qualification program to include reaction to the identified abnormal operating conditions for all its covered tasks.

Response:

Ferrellgas will amend the written qualification documents to include "reaction to the identified abnormal operating conditions". This will be completed by September 30th, 2019

Thank you,

Rufus Youngblood
Director Safety



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