



U.S. Department
of Transportation

Pipeline and
Hazardous Materials
Safety Administration

840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628
609.771.7800

NOTICE OF AMENDMENT

OVERNIGHT EXPRESS DELIVERY

February 15, 2024

Mr. Joseph Hartz
President
UGI Energy Services
835 Knitting Mills Way
Wyomissing, PA 19610

CPF 1-2024-006-NOA

Dear Mr. Hartz:

From October 3, 2022, to October 6, 2022, representatives of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code (U.S.C.) conducted an on-site inspection of UGI Energy Services' (UGI) procedures and records for control room management of its central gas control room in Wyomissing, Pennsylvania.

As a result of the inspection, PHMSA has identified an apparent inadequacy found within UGI's plans or procedures. The items inspected and the inadequacy are described below:

1. § 192.631 Control Room Management.

(a) General.

(1) This section applies to each operator of a pipeline facility with a controller working in a control room who monitors and controls all or part of a pipeline facility through a SCADA system. Each operator must have and follow written control room management procedures that implement the requirements of this section...

(c) Alarm management. Each operator using a SCADA system must have a written alarm management plan to provide for effective controller response to alarms. An operator's plan must include provisions to:

(1) ...

(5) Monitor the content and volume of general activity being directed to and required of each controller at least once each calendar

year, but at intervals not to exceed 15 months, that will assure controllers have sufficient time to analyze and react to incoming alarms;

UGI's written control room management procedures were inadequate. Specifically, UGI's *Central Gas Control Room Management Plan*, published 1/16/2020, failed to include provisions to monitor the content and volume of general activity being directed to and required of each controller at least once each calendar year, but at intervals not exceeding 15 months, to assure controllers have sufficient time to analyze and react to incoming alarms.

During the inspection, PHMSA requested to review UGI's procedures for monitoring and analyzing the general activity of the controllers pursuant to § 192.631(e)(5). UGI referred PHMSA to Section 4.0.8, Alarm Load Monitoring, of its Gas Control Procedures Section 4.0 - Alarm Management Plan as containing the required provisions. This section stated "[a] comprehensive controller workload review, including alarm load, will be performed once each calendar year but at intervals not to exceed 15 months. The Hickory Bend Operations manager will provide the appropriate data from the Ignition SCADA system so that it may be appropriately factored into this review."

However, this procedure failed to provide the actual provisions of how the monitoring of content and volume of general activity being directed to and required of each controller is conducted or identified, in order to be able to conduct a compliant required evaluation that will assure controllers have sufficient time to analyze and react to incoming alarms. The requirement for conducting the required evaluation at least every 15 months includes monitoring all activities directed at a controller, including non-alarm management tasks, and the written procedure failed to describe how the workload study must be conducted to ensure a consistent and comprehensive review is completed. UGI's procedures didn't identify any specific provisions or relevant activities directed at a controller, but rather just generically referred to "appropriate" data being provided to be "appropriately factored into this review" without any further specificity.

Therefore, UGI's written control room management procedures were inadequate. UGI must revise its procedures to include adequate details on how it monitors the content and volume of general activity being directed to and required of each controller to assure controllers have sufficient time to analyze and react to incoming alarms.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.206. Enclosed as part of this Notice is a document entitled Response Options for Pipeline Operators in Compliance Proceedings.

Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. § 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under

5 U.S.C. § 552(b).

Following the receipt of this Notice, you have 30 days to submit written comments, revised procedures, or a request for a hearing under §190.211. If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue an Order Directing Amendment. If your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.206). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 30 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that UGI maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Robert Burrough, Director, Eastern Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 1-2024-006-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert Burrough", is positioned above the printed name.

Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration

Enclosure: Response Options for Pipeline Operators in Enforcement Proceedings