



April 26, 2023

VIA ELECTRONIC MAIL

@ dustin.hubbard@dot.gov

Dustin Hubbard

Director, Office of Pipeline Safety-Western Region
US Department of Transportation,
Pipeline and Hazardous Materials Safety Administration
12300 West Dakota Avenue, Suite 110, Lakewood, CO, 80228

Re: Notice of Amendment, CPF 5-2023-028-NOA

Dear Mr. Hubbard:

This is a response to the Pipeline and Hazardous Materials Safety Administration (PHMSA) Notice of Amendment, CPF 5-2023-028-NOA, which was addressed to AmeriGas' Vice President, Kevin Kelleher, dated April 18, 2023, addressing areas of concern with the AmeriGas Operations and Maintenance manual for pipeline facilities under the jurisdiction of PHMSA.

AmeriGas is committed to the safety of our employees, customers, and neighbors and compliance with the Federal regulations. AmeriGas takes PHMSA concerns seriously. These responses are not an admission by AmeriGas that the violations alleged by PHMSA are actual violations.

1.§ 192.303 Compliance with specifications or standards.

Each transmission line or main must be constructed in accordance with comprehensive written specifications or standards that are consistent with this part.

AmeriGas failed to prepare a written specification for the construction of mains that is consistent with the requirements of 49 CFR 192. AmeriGas's plastic pipe construction specification is found within their "Pipeline Safety Operations and Maintenance Manual" (Rev. January 2022) (specifically the section within that document titled "Plastic Pipe"). This document does not include the specific requirements for mechanical fittings described in 49 CFR 192.281(e)(3) and (4).

Mr. Dustin Hubbard

April 26, 2023

Page 2

RESPONSE:

AmeriGas will amend its Operation and Maintenance manual, Construction of Mains procedure, page 22 of 53, to include the requirements of 49 CFR 192.281(e)(3) and (4), see included draft. This change will become effective during the next bi-annual update to the O&M, scheduled to be released to filed operations July 31, 2023.

2. § 192.605 Procedural manual for operations, maintenance, and emergencies.

(a)

(b) *Maintenance and normal operations.* The manual required by paragraph (a) of this section must include procedures for the following, if applicable, to provide safety during maintenance and operations.

(1) Operating, maintaining, and repairing the pipeline in accordance with each of the requirements of this subpart and subpart M of this part.

AmeriGas's operations and maintenance manual lacked adequate procedures for repairing pipeline leaks in accordance with subpart M. Specifically, the "Pipeline Safety Operations and Maintenance Manual" (Rev. January 2022) did not prohibit the use of mechanical leak clamps as a permanent repair per 49 CFR 192.720. AmeriGas must amend this document to ensure that mechanical leak clamps are not used as a permanent repair method for plastic pipe.

RESPONSE:

AmeriGas will amend its Operation and Maintenance manual, Construction of Mains procedure, page 24 of 53, to include the requirements of 49 CFR 192.720, see included draft. This change will become effective during the next bi-annual update to the O&M, scheduled to be released to filed operations July 31, 2023.

Thank you for your consideration in this matter. Please do not hesitate to contact me at 215-970-4159 or by email at david.hedrick@amerigas.com if you or your staff have any questions or require additional information.

Thank you,

David Hedrick

David Hedrick

Pipeline Manager

AmeriGas Propane, LP

Cc: R. Kiley, AmeriGas Safety Group Director
J. McElwee, AmeriGas Counsel