

NOTICE OF AMENDMENT

VIA ELECTRONIC MAIL TO: Kevin.Kelleher@amerigas.com

April 24, 2025

Mr. Kevin Kelleher
Vice President – Supply & Logistics and Operations
AmeriGas Propane Corporation
500 N. Gulph Road
King of Prussia, PA 19406

CPF 5-2025-019-NOA

Dear Mr. Kelleher:

From September 16 to September 20, 2024, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA), Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code (U.S.C.), inspected the AmeriGas Propane LP Services (AmeriGas) on the island of Oahu in the state of Hawaii.

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

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's procedures were inadequate to maintain pipeline safety as they did not contain detailed specifications or standards consistent with subpart G as required. Specifically, during the inspection, PHMSA reviewed AmeriGas's Operations and Maintenance Procedure Manual, Construction of Mains, which was updated on July 31, 2024. During that review, PHMSA observed that the manual did not include a procedure for the installation of plastic pipeline mains terminating aboveground consistent with § 192.321(i). In addition, the manual also lacked a

procedure that included the appropriate underground clearance when installing a transmission line consistent with § 192.325(a).

Therefore, AmeriGas must revise its Operations and Maintenance Procedure Manual, Construction of Mains to be consistent with the requirements of subpart G.

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

(a) *General.* Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response. For transmission lines, the manual must also include procedures for handling abnormal operations. This manual must be reviewed and updated by the operator at intervals not exceeding 15 months, but at least once each calendar year. This manual must be prepared before operations of a pipeline system commence. Appropriate parts of the manual must be kept at locations where operations and maintenance activities are conducted.

AmeriGas's procedures were inadequate to maintain pipeline safety because they did not contain specific instructions detailing how operator personnel would go about performing the specified tasks listed within the manual. During the inspection, PHMSA reviewed AmeriGas's Operations and Maintenance (O&M) manual in its entirety. The PHMSA inspector observed during their review that the O&M manual was nearly verbatim to the requirements of Part 192 and did not include the specificity required to carry out the procedures. PHMSA observed that the O&M lacked such information as who was to perform which tasks, how that person(s) was to be qualified to perform those tasks, what tasks were to be performed when, where personnel were to be located when performing these tasks, instructions on how each task was to be performed, what equipment was to be utilized during the performance of said task, how that information was to be recorded, analyzed, and retained, and next steps at the end of the task. While in many instances, what, when and how a task is performed can be gleaned from the pipeline safety regulations, the remaining steps are determined by the pipeline operator for its specific system and documented as procedures within its O&M, in accordance with § 192.605(a).

AmeriGas must amend its O&M in its entirety to include specific instructions detailing how its personnel would perform each of the tasks specified by the pipeline safety regulations, as required.

3. § 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 procedures were inadequate to maintain pipeline safety as they did not contain procedures for operating, maintaining, and repairing the pipeline in accordance with each of the requirements of subpart L. Specifically, during the inspection, PHMSA reviewed AmeriGas's Operations and Maintenance Procedure Manual, Maximum Allowable Operating Pressure, which was updated on July 31, 2024. During that review, PHMSA observed that the manual had not been updated with the latest Table 1 from 192.619(a)(2)(ii) on how to determine maximum allowable operating pressure (MAOP) pursuant to the requirements of § 192.619(a)(2)(ii).

Therefore, AmeriGas must revise its Operations and Maintenance Procedure Manual, Maximum Allowable Operating Pressure, to include allowing an operator to calculate its MAOP pursuant to the requirements of § 192.619(a)(2)(ii).

4. § 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) ...

(2) *Controlling corrosion in accordance with the operations and maintenance requirements of Subpart I of this part.*

AmeriGas's procedures were inadequate to maintain pipeline safety as they did not contain procedures for controlling corrosion in accordance with the operations and maintenance requirements of subpart I. Specifically, during the inspection, PHMSA reviewed AmeriGas's Operations and Maintenance Procedure Manual, Corrosion Control, which was updated on July 31, 2024. During that review, PHMSA observed that the manual lacked a procedure requiring electrically isolated metal alloy fittings installed after January 22, 2019, not meeting the requirements of § 192.455(f), to be cathodically protected and maintained as required pursuant to § 192.455(g). In addition, PHMSA observed that the manual failed to include a procedure requiring each reverse current switch, each diode, and each interference bond whose failure would jeopardize structure protection to be electrically checked for proper performance six times a calendar year at intervals not to exceed 2 ½ months as required per § 192.465(c).

Therefore, AmeriGas must revise its Operations and Maintenance Procedure Manual, Corrosion Control, to include procedures for controlling corrosion in accordance with the operations and maintenance requirements of subpart I.

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 60 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 AmeriGas Propane Corporation maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to Dustin Hubbard, Director, Western Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 5-2025-019-NOA** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

Dustin Hubbard
Director, Western Region
Pipeline and Hazardous Materials Safety Administration

cc: PHP-60 Compliance Registry
PHP-500 J. Gilliam (#24-297238)

Enclosure: *Response Options for Pipeline Operators in Enforcement Proceedings*