



May 22, 2025

VIA ELECTRONIC MAIL

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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 5-2025-019-NOA

Dear Mr. Hubbard:

This is a response to the Pipeline and Hazardous Materials Safety Administration (PHMSA) **NOTICE of AMENDMENT (CPF 5-2025-019-NOA)** which was addressed to AmeriGas' Vice President, Kevin Kelleher, dated April 24, 2025, 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'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.

RESPONSE:

AmeriGas has partnered with an external vendor specializing in Operations and Maintenance procedures/programs to assist AmeriGas with updating and revising the Construction of Mains procedure to include both § 192.321(i) and § 192.325(a) to be consistent with subpart G. AmeriGas intends to have the updated Operations and Maintenance Manual completed by March 1, 2026, and intends to provide PHMSA with the copy of the updated Construction of Mains procedure at that time.

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.

RESPONSE:

AmeriGas has partnered with an external vendor specializing in Operations and Maintenance procedures/programs to assist AmeriGas with updating and revising our Operations and Maintenance Manual to include specific instructions detailing how operator personnel would go about performing the specified tasks listed within the manual as well as the necessary equipment needed to perform the task in accordance with § 192.605(a). AmeriGas intends to have the updated Operations and Maintenance Manual completed by March 1, 2026, and intends to provide PHMSA with the copy of the updated manual at that time.

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).

RESPONSE:

AmeriGas has partnered with an external vendor specializing in Operations and Maintenance procedures/programs to assist AmeriGas with updating and revising our Operations and Maintenance Manual to include procedures that give our operators clear insight into operating, maintaining, and repairing the pipeline in accordance with subparts M and L. During our revision, AmeriGas intends to revise the Maximum Allowable Operating Pressure (MAOP) procedure, to allow operators to calculate MAOP in accordance with § 192.619(a)(2)(ii). AmeriGas intends to have the updated Operations and Maintenance Manual completed by March 1, 2026, and intends to provide PHMSA with the copy of the updated MAOP procedure at that time.

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 catholically 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:

AmeriGas has partnered with an external vendor specializing in Operations and Maintenance procedures/programs to assist AmeriGas with updating and revising our Operations and Maintenance Manual to include procedures for controlling corrosion in accordance with the requirements of 192 subpart I. AmeriGas intends to have the updated Operations and Maintenance Manual completed by March 1, 2026, and intends to provide PHMSA with a copy of the updated Corrosion Control procedure at that time.

Thank you for your consideration in this matter. Please do not hesitate to contact me at (678) 906-6261 or by email at pamela.cannon@amerigas.com if you or your staff have any questions or require additional information.

Thank you,

Pamela Cannon

Pamela Cannon
Director Of Regulatory Compliance
AmeriGas Propane, LP

Cc: D, Lupini, Vice President of Safety
J. McElwee, AmeriGas Counsel