

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

March 6, 1998

Mr. John Sette
Vice-President/General Manager - Amerigas Region 7
Amerigas Partners, L.P.
5250 East US 36; Suite 710
Danville, IN 46122

CPF No. 38003M

Dear Mr. Sette:

On December 29-31, 1997, representatives of the Central Region, Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code, conducted an onsite pipeline safety inspection of Amerigas Propane Company's facilities in Flint Hill, MO.

As a result of the inspection, it appears that you have committed probable violations, as noted below, of the pipeline safety regulations, Title 49, Code of Federal Regulations, Part 192. The items inspected and the probable violations are:

- 1. § 192.605(b) Procedural Manual for Operations, Maintenance, and Emergencies.**

Each operator shall prepare and follow for each pipeline system, a manual of written procedures for conducting operations and maintenance activities and for emergency response. The manual required must provide procedures to provide safety during maintenance and operations.

Review of Amerigas' O&M procedural and emergency manuals found that several procedures needed to be added or revised. The procedures that were missing or inadequate are as follows:

- 1) **§ 192.483** - Procedures for remedial measures that indicate that the replacement pipe will be coated and cathodically protected; that the operator will replace generally corroded pipe; and that all pipe that has localized pitting will be repaired or replaced.
- 2) **§ 192.605(b)(5)** - Procedures for the start-up and shutdown of the distribution systems to assure that the MAOPs will not be exceeded.
- 3) **§ 192.605(b)(8)** - Procedures for the periodical review of the work done by the operating personnel to determine the adequacy of the existing procedures.
- 4) **§ 192.616** - Procedures for establishing a public educational program.
- 5) **§ 192.619 and 621** - Procedures for the establishment of the MAOP.
- 6) **§ 192.703(b)&(c)** - Procedures requiring that each segment of pipeline that becomes unsafe must be replaced, repaired, or removed from service and that hazardous leaks will be repaired promptly.
- 7) **§ 192.739(c)** - Procedures to check the setpoint for the regulators on the propane tanks.
- 8) **§ 192.743** - Procedures to check the relief device capacity and setpoint.

When it is found that an operator's procedures are inadequate, 49 C.F.R. § 190.237 provides that the operator, after notice and opportunity for hearing, may be required to amend its plans and procedures. This letter serves to provide you with notice of the inadequate procedures and the response options as prescribed under § 190.237. The operator is allowed thirty (30) days after receipt of such notice to submit written comments or request a hearing. After considering the material presented, the Office of Pipeline Safety is required to notify the operator of the required amendment or withdraw the notice proposing the amendment. If you do not desire to contest the notice, please provide the revised procedures within thirty (30) days of receipt of this notice.

Sincerely,

Ivan A. Huntoon
Director, Central Region
Office of Pipeline Safety