

**From:** [Horensky, Robert](#)  
**To:** [Rachael Gunaratnam](#)  
**Cc:** [Smith, Terri Cooper](#); [Kaster, Allison](#)  
**Subject:** RE: [External] RE: PUC inspections of UGI's valves and public awareness programs  
**Date:** Wednesday, September 18, 2024 11:12:44 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

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Rachael-

Operators have written procedures to address valve maintenance (and other O&M tasks and processes). Those procedures can detail requirements beyond the federal code and can be enforceable. The federal code is the minimum requirement, and the operator create their procedures to meet or exceed the code. UGI's procedures are in their GOM.

Please reference 49 CFR 192.605. If you would like to discuss further, I can be available.



**Robert Horensky**  
Manager, Safety Division  
Bureau of Investigation and  
Enforcement  
**Phone:** [REDACTED]  
**Email:** [REDACTED]  
**Consumer Hotline:**  
1-800-692-7380

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**From:** Rachael Gunaratnam <[REDACTED]>  
**Sent:** Wednesday, September 18, 2024 11:04 AM  
**To:** Horensky, Robert [REDACTED]  
**Cc:** Smith, Terri Cooper [REDACTED]; Kaster, Allison [REDACTED]  
**Subject:** [External] RE: PUC inspections of UGI's valves and public awareness programs

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Rob,

I had a quick question regarding your response below. What does it mean that "I&E Safety

would then apply UGI's procedures"?

Thanks,  
Rachael

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**From:** Horensky, Robert <[REDACTED]>  
**Sent:** Wednesday, September 18, 2024 8:50 AM  
**To:** Rachael Gunaratnam [REDACTED]  
**Cc:** Smith, Terri Cooper <[REDACTED]>; Kaster, Allison <[REDACTED]>  
**Subject:** PUC inspections of UGI's valves and public awareness programs

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Good morning Rachael-

NTSB provided a request for information last week-

“Attached is a UGI’s report of its 5-year state inspections of UGI’s valve maintenance or public awareness program—its 11 pgs. I wanted to request from PA PUC whether they issued any citations in that same time period (2018-2023) to UGI in regard to their valve maintenance and also on their public awareness. My factual at the moment says there were no compliance issues found but I wanted to double check with the PUC to verify this. If you could let me know by the end of this week, would appreciate it.”

In response to NTSB’s requests regarding valve and public awareness inspections results, we have the following comments after a review of records and internal meetings:

- I&E Pipeline Safety has no record of direct potential violations of either 49 CFR 192.747(valve maintenance) or .616(Public Awareness) resulting from a UGI Utilities inspections from 2018-2023.
- A complaint regarding the Millersville explosion, docketed at C-2018-300515, contains language about the use of valves during an emergency . The complaint and orders are public and can be found through a document search on the PA PUC website.

In a subsequent email later last week, NTSB asked the following question:

“I had one more question regarding PUC’s enforcement authority. UGI was not able to access the secondary valve during the March 24, 2023 incident in West Reading. Does PUC have enforcement authority over this issue? These were secondary valves not regulated under 49 CFR Part 192; only UGI’s critical valves in accordance to 192.747 must be “readily accessible” for operating and emergency purposes. “

In response to NTSB's subsequent request, we have the following comments:

- The state gas regulations at 52 PA Code 59, do not contain language addressing maintenance of valves that are not identified or classified as emergency valves. Therefore, the answer to enforceability authority question is "NO". I&E Safety would then apply UGI's procedures.

I apologize for any delayed response as we did our records search and internal review.

Please let us know if there are any additional questions and please copy me on all requests and correspondence.

Thank you,

Rob



**Robert Horensky**  
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