LETTER OF CONCERN

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Dennis E. Stinson Vice President of Operations Philadelphia Gas Works 800 W. Montgomery Avenue Philadelphia, PA 19122

Dear Mr. Stinson:

On January 27, 1997, a representative of the Eastern Region, Office of Pipeline Safety, conducted an incident investigation in regards to a 6" cast iron main break that occured January 24, 1997, on your low pressure distribution system which resulted in an explosion at 3648 North 9th Street in Philadelphia.

CPF No.: 17005C

As part of the investigation we reviewed Philadelphia Gas Work's (PGW) response time to the incident and actions taken to implement emergency procedures upon arrival at the incident scene. Based upon the information and records you provided during our review we found no non-compliance issues. However, one area came to our attention which has caused some concern. We hope that you will give this your attention.

At 1:54 PM on January 24, 1997, an odor complaint was phoned into PGW by Mr. Ernist Shield, a resident at 3648 North 9th Street. The call was processed by PGW and classified as a 511 order (general gas leak in basement). At around 2:20 PM, PGW received a report of an explosion at 3648 North 9th Street. Fortunately, Mr. Shield, at home at the time of the explosion, was not injured. Although PGW did dispatch a service crew promptly, a review of the taped telephone conversation PGW had with Mr. Ernist Shield, approximately 24 minutes before his residence exploded, raised a doubt that the questions asked during the conversation, may not have provided the employee processing this, or similar calls, enough information to preliminarily assess the severity of the situation and to properly categorize the leak complaint as a general gas leak or a prospective emergency according to PGW's procedures.

We suggest that PGW consider implementing a standardized list of questions or a script

that could be used by personnel that process leak and odor complaints. A standardized script would improve consistency in the way leak or order calls are processed and may provide the operator additional information that could be used in evaluating the severity of the situation. We have informally solicited information from other distribution operators within the Eastern Region and have found that the majority of the operators queried utilize scripts that tend to be more detailed than PGW's procedure outlined in section 4.2 of the customer service manual.

Based upon a review of questions utilized by other operators, we have compiled a list of questions most commonly asked by other operators in processing leak and odor complaints. I have included these as an attachment to this letter.

I hope that you will consider this area of concern and our suggestions as constructive relating to pipeline safety. If we can answer any questions or be of any help, please call us at (202) 366-4580. You can also contact Mike Yazemboski at (609) 989-2181. Mike is the lead engineer regarding the above.

Sincerely,

William H. Gute Eastern Regional Director Office of Pipeline Safety

Enclosure

W/GUTE/cb/DPS-24/366-4580/5-20-97

FILE: LOC 17005C/Re: Response Procedures

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cc: Mike Yazemboski, Compliance Registry, NJDO, DPS-24, Bill

COMMON QUESTIONS ASKED BY OPERATORS IN PROCESSING LEAK AND ODOR COMPLAINTS

- , Name, Address, Telephone number where emergency is located
- , Determine Type of Emergency or odor complaint
- , Determine callers status; (Customer, Passerby, Police/Fire Dept, employee, Other____.
- , Business or Residential (Is this a school, Hospital, Office Building, etc...?)
- , How long has the odor been noticed?
- , Severity of the odor (strong, slight, none)
- , If Gas Odor indicated, ask following questions, e.g.;
 - 1. Checked pilot light?
 - 2. Can you hear, see, or feel anything?
 - 3. Is there anyone working on piping or digging outside with construction in the area?
 - 4. Any work in the house, plumbing, new appliances, etc...?
 - 5. Anyone recently moved in or out of your building, (if multi-residential)?
- Location of emergency: (inside, outside) Where is odor or smell the strongest?
- , If inside, advise caller of the steps to take:
 - 1. If an extremely hazardous condition is suspected, by the callers tone or by the description of the problem, advise the caller to initiate evacuation of the other occupants and leave the building.
 - Advise the caller not to operate any electrical light switches, appliances nor to hang up the phone.
 - 3. Inform the caller that a service man will be sent (be specific, within 60 min., within 30 min., etc.) and must have access to the building. (note access arrangements appropriately)

If odor is at a non-specific location, ask for details (landmarks, closest intersection, mailboxes, hydrants, store names, gas stations. Etc...)