

**Allentown**  
City without limits.

**Ed Pawlowski, Mayor**  
**City of Allentown**  
435 Hamilton Street  
Allentown, PA 18101-1699  
Office 610.437.7546  
fax 610.437.8730  
Ed.Pawlowski@allentownpa.gov

December 21, 2012

**VIA FEDEX OVERNIGHT (PRIORITY)**

Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
2<sup>nd</sup> Floor  
Harrisburg, Pennsylvania 17105  
ATTN: Secretary, Rosemary Chiavetta

**RECEIVED**

DEC 21 2012

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S OFFICE

Re: **EXCEPTIONS OF MANUEL E. CRUZ, INTERVENOR**  
**PA PUC v. UGI Utilities, Inc.**  
C-2012-2308997  
Allentown Gas Explosion (02/09/11)

Dear Ms. Chiavetta:

I have been informed of Intervenor Manuel E. Cruz's November 20, 2012 "Exceptions" to the Honorable David A. Jalapa's Initial Decision approving the Joint Settlement Petition in the above-referenced matter. I write to join in Mr. Cruz's exception to the proposed fourteen (14) year time period for UGI to replace the cast iron pipelines in the City of Allentown.

Although, like Mr. Cruz, I am pleased to learn that UGI has agreed to accelerate its twenty (20) year cast iron replacement plan to fourteen (14) years, I believe that, given the history of the danger that cast iron pipelines represents to the safety and welfare of the citizens of Allentown, a ten (10) year replacement period is necessary. In this manner, we can protect the citizens of Allentown so that no other family suffers the same tragedy as Mr. Cruz.

The history of the danger that cast iron pipelines represents to the safety and welfare of the citizens of Allentown is well documented. Over twenty (20) years ago, in a July 10, 1992 letter to UGI, the National Transportation Safety Board ("NTSB") advised that UGI had to replace miles of corroding pipeline in Allentown in order to reduce the threat to public safety after a 1990 fatal gas explosion in Allentown about one (1) mile from the February 9, 2011 explosion. (A copy of the July 10, 1992 NTSB letter is enclosed herein for your ready reference). In fact, the NTSB advised UGI that "[t]he Allentown

**Pennsylvania Public Utility Commission**

**Page 2 of 2**

infrastructure contains many miles of . . . cast iron gas and water mains installed in the late 1800s and early 1900s that have likely been weakened by corrosion[.]. The NTSB made clear that it was concerned that old cast iron pipelines were a growing threat in Allentown. The NTSB noted that, in the fifty-one (51) years between 1925 and 1976, two (2) significant gas explosions had occurred in Allentown, which resulted in the death of ten (10) individuals and the injury of twenty-four (24) individuals. The NTSB wrote that, in the sixteen (16) years between 1976 and July 10, 1992, two (2) more gas explosions occurred, which resulted in the deaths of three (3) people, the injury of twenty-three (23) people and the destruction or damage of eleven (11) homes.

For these reasons, UGI should be required to institute a ten (10) year cast iron replacement plan. The ten (10) year period is clearly necessary to protect Allentown's residents.

Thank you for your immediate attention to this matter.

Sincerely,



ED PAWLOWSKI  
Mayor

Encl.

cc: David MacGregor, Esq.  
Office of Special Assistants (via email: [ra-OSA@pa.gov](mailto:ra-OSA@pa.gov))  
Adam Young, Esq.



*Log P-300C*

## National Transportation Safety Board

Washington, D.C. 20594  
Safety Recommendation

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Date: July 10, 1992

In reply refer to: P-91-18 and -19  
(Supersedes Safety Recommendation  
Letter Issued August 6, 1991)

**RECEIVED**

Honorable Joseph S. Daddona  
Mayor  
City of Allentown  
435 Hamilton Street  
Allentown, Pennsylvania 18101

DEC 21 2012

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

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At 5:13 a.m. eastern daylight time on August 29, 1990, a natural gas explosion and fire destroyed two row houses at 421-423 North Fifth Street and damaged two adjacent houses and three parked cars in Allentown, Pennsylvania. One person was killed, and nine people, including two firefighters, were injured.<sup>1</sup>

Three hours before the accident, a police officer advised the Allentown public works dispatcher that water was leaking through pavement cracks in front of 421 North Fifth Street. The officer said that he believed that repairs could be deferred until the next day. Minutes after 5 a.m., a North Fifth Street resident notified the city of a gas odor in the area of 421 North Fifth Street and at 5:09 p.m., police and fire personnel arrived at the location. Four minutes later the explosion occurred. Firefighters and police evacuated residents from houses within the danger zone. To eliminate potential gas leaks from piping in adjacent residences, they closed the gas valves at inside meter sets.

The fire department notified the gas operator, UGI Corporation (UGI), of the gas leak. When UGI employees arrived at 5:30 p.m., they began searching for leaking gas and found that several gas valves had not been turned off. They then shut off gas to residences at the key-operated curb valves and then at meters where valves had not previously been closed. The UGI employees later located a broken cast-iron main as the source of the leaking gas.

Because they were not trained or equipped to close the curbside key-operated valves, the city emergency response personnel potentially endangered themselves when they entered buildings to close inside gas meter valves. Although the UGI has trained emergency response agency personnel when requested, the training did not adequately cover the use of outside gas service line valves. In its findings from previous accidents,<sup>2</sup> the Safety

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<sup>1</sup>NTSB Brief of Accident File No. DCA90FP001 (attached).

<sup>2</sup>For more detailed information, read Pipeline Accident Report-- "National Fuel Gas Company, Natural Gas Explosion and Fire, Sharpville, Pennsylvania, February 22, 1985" (NTSB/PAR-85/02).

Board addressed the limited emergency response capabilities of gas operators and encouraged them to train and use local emergency response agency personnel to accomplish initial lifesaving actions until gas operator employees arrive on scene. To achieve effective results, gas operators must provide response personnel with thorough initial and recurrent training on identifying hazardous conditions and on the corrective actions to take.

The National Transportation Safety Board's investigation disclosed that water leaking from a circumferential crack in a 6-inch cast-iron municipal water main beneath North Fifth Street's east side had eroded the soil foundation of a low pressure (9 inches water column pressure) 4-inch cast-iron UGI gas main beneath the west side of North Fifth Street. The gas main subsequently cracked circumferentially and natural gas filled the void beneath the pavement. Natural gas then migrated through the soil and into the basement of 423 North Fifth Street, where it ignited, exploded, and burned. Subsequent metallurgical examinations revealed that both cast-iron mains were significantly weakened by graphitic corrosion. The water main was installed in the late 1800s and the gas main was installed in 1903.

The Safety Board reviewed the operating and maintenance practices of both the city and UGI and previous natural gas accidents within the city. Based on these reviews, the Safety Board determined that:

- o Prior to August 29, 1990, two breaks had occurred on the 4-inch cast-iron main in the 400 block of North Fifth Street on January 15, 1981, and January 24, 1988.
- o Since 1970, UGI has averaged 1.2 reported incidents<sup>3</sup> per year on its cast-iron mains.
- o From 1925 to 1976, 10 persons were killed, 24 persons were injured, and 2 buildings were destroyed as the result of 2 gas explosions in the city of Allentown.
- o Since 1976, 3 persons were killed, 23 persons were injured, 6 buildings were destroyed, and 5 buildings were damaged as a result of 2 gas explosions in the city of Allentown.
- o The Allentown infrastructure contains many miles of small diameter (8 inches and less) cast-iron gas and water mains installed in the late 1800s and early 1900s that have likely been weakened by corrosion.

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<sup>3</sup>An incident means an event that involves a release of gas from a pipeline and a death, personal injury requiring hospitalization, or estimated property damage of \$50,000 or more (before July 1, 1984, the property damage amount was \$5,000).

- o Water from leaking storm, water, and sewage lines has eroded and dissolved the soil supporting the water and gas mains and other structures creating sinkholes and other underground cavities beneath the city streets.
- o Heavy traffic loads, cracked pavement, and soil movement have increased the stress on buried cast-iron mains.
- o The UGI, the city, and other operators of underground facilities that find sinkholes and other underground voids when excavating have individually documented their findings, but a reciprocal system for centrally documenting or exchanging this information does not exist.
- o The UGI has not coordinated sufficiently with local fire, police, and other public officials to familiarize them with UGI's emergency procedures for locating and using key-operated service line shutoff valves to stop the gas flow to buildings.

The Safety Board's investigation determined that while underground facility operators performing an excavation will record the existence of underground voids, they notify other operators only when they see an underground structure within the void that belongs to another operator. This practice results in information not being consolidated and disseminated to all underground facility operators. Such information would aid all underground facility operators in identifying conditions that may adversely affect their facilities, in identifying city areas that may require enhanced surveillance, and in planning for new underground facilities. The Safety Board believes the city of Allentown, because it operates several underground facilities and performs some liaison activities with all underground facility operators in the city, could best coordinate the development of a centralized process for collecting and documenting all discoveries of underground voids and make that information available to all operators of underground facilities. One method to coordinate the collection and dissemination of information would be to use the existing one-call excavation notification communication network that now has a communication network with underground facility operators.

Therefore, the National Transportation Safety Board recommends that the city of Allentown:

Coordinate with the UGI Corporation to obtain initial and recurrent training for emergency response personnel on controlling natural gas in emergency situations, including how to locate, identify, and operate outside key-operated shutoff valves. (Class II, Priority Action)  
(P-91-18)

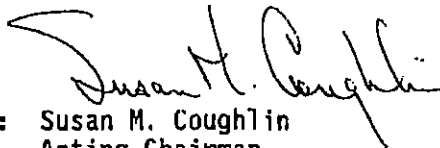
Coordinate with known underground facility operators in the immediate Allentown vicinity to develop systematic procedures for centrally reporting, documenting, and exchanging information on the location of underground voids discovered through excavations or other means. (Class II, Priority Action) (P-91-19)

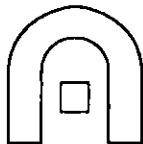
Also, the Safety Board issued Safety Recommendations P-91-12 to the Research and Special Programs Administration; P-91-13 through -16 to UGI Corporation; and P-91-17 to the National Association of Regulatory Utility Commissioners.

The National Transportation Safety Board is an independent Federal agency with the statutory responsibility "to promote transportation safety by conducting independent accident investigations and by formulating safety improvement recommendations" (Public Law 93-633). The Safety Board is vitally interested in any action taken as a result of its safety recommendations. Therefore, it would appreciate a response from you regarding action taken or contemplated with respect to the recommendations in this letter. Please refer to Safety Recommendations P-91-18 and -19 in your reply.

KOLSTAD, Chairman, COUGHLIN, Vice Chairman, and LAUBER and HART, Members, concurred in these recommendations. Member HAMMERSCHMIDT did not participate.

COUGHLIN, Acting Chairman, and LAUBER, KOLSTAD, HART, and HAMMERSCHMIDT, Members, concurred in the revision of this Safety Recommendation Letter.

  
By: Susan M. Coughlin  
Acting Chairman



Allentown  
City without limits.

Office of the Mayor  
City of Allentown  
435 Hamilton Street  
Allentown PA 18101-1699

PENNSYLVANIA PUBLIC UTILITY COMMISSION  
COMMONWEALTH KEYSTONE BUILDING  
400 NORTH STREET  
2ND FLOOR  
HARRISBURG PA 17105  
ATTN: SECRETARY ROSEMARY CHIAVETTA

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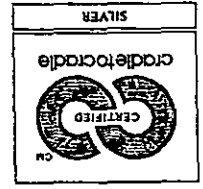
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