

28 February 2013

Continental Industries supports approval of Polyamide 12 (PA 12) pipe for use in gas applications. Our company has supplied steel and plastic fittings for natural gas distribution since 1960 and we have supplied PA 12 fittings since 2007. We believe PA 12 is safe for applications to 250 pounds per square inch. We believe there are significant life-cycle cost savings in using PA 12 and it will have supplemental environmental benefits. We believe that PHMSA's approval of PA 12 will allow local distribution companies to design, construct, and maintain infrastructure for the safe and reliable delivery of natural gas.

We understand that the Pipeline and Hazardous Materials Safety Administration (PHMSA) of the U.S. Department of Transportation ("DOT") has granted a petition for rulemaking on this subject. The petition requests PHMSA to amend §§ 192.121 and 192.123 of the Federal Pipeline Safety Regulations (PSR) to allow the use of PA12 piping systems: include maximum design pressure limitations for PA12 piping systems; and incorporate by reference ASTM International (ASTM) standards pertaining to PA12 Pipe and Components. A public docket for the petition has been established at www.regulations.gov in Docket No. PHMSA-2010-0009. The regulatory identification number for the rulemaking is 2137-AE93. We understand our letter will become part of that public file. We welcome further discussion with the DOT on this issue.

Regards,



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