

AUG 18 2014

Mr. Jeffrey D. Wiese
Associate Administrator for Pipeline Safety
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration / Office of Pipeline Safety
1200 New Jersey Ave., SE
Room E22-330
Washington, DC 20590-0001

Re: Petition DOT PHMSA to allow above-ground, encased plastic pipe for regulator and metering stations:

Dear Mr. Wiese:

The Gas Piping Technology Committee (GPTC) consists of 95 members with technical expertise in natural gas distribution, transmission, and gathering systems. Its membership is balanced between gas distribution operators, gas transmission operators, manufacturers, and general interest personnel such as federal and state regulators.

The GPTC is an independent technical committee and has been an American National Standards Institute (ANSI) Accredited Standards Committee (ASC) since 1992 and has the designation of GPTC Z380. The American Gas Association (AGA) has been the Secretariat to ASC GPTC Z380 since 1990.

Part of the scope of GPTC is to petition the U.S. Department of Transportation (DOT), through the Pipeline and Hazardous Materials Safety Administration (PHMSA), for changes in the pipeline safety regulations based on the committee's technical expertise.

It has been the standard practice for some gas operators to terminate the plastic pipe, encased in steel pipe, above ground level as it extends from the inlet or outlet of regulator and metering station installations. This is often accomplished through use of an anodeless riser. In similar situations where the piping is considered a service line there is no issue with this practice because it meets the requirements of §192.375(a)(2). However, where the piping is considered main, gas operators might not be considered compliant with §192.321 if the plastic pipe terminates above ground level, as plastic may only be installed above ground per paragraph (g), temporary above ground installation of uncased pipe, and paragraph (h), on bridges.

The termination of plastic pipe encased in steel pipe above ground level at the inlet or outlet of regulator and meter station installations presents no additional safety concerns as compared to steel piping that transitions to plastic piping with a below ground steel to plastic transition fitting. Utility experience has been that most damage to regulator and meter stations occurs through vehicular damage or fire. If either of these events is severe enough to cause failure of the steel or plastic piping, gas will be vented to the atmosphere and not become a downstream safety issue.

GPTC concludes that it is good design practice to transition to plastic pipe above ground and avoid concern about a short section of steel pipe downstream of the regulator or metering station that would need cathodic protection. Therefore, GPTC proposes a revision to §192.321 as shown in the enclosed GPTC Petition Attachment.

Sincerely,

A handwritten signature in black ink that reads "Paul Cabot". The signature is written in a cursive style with a long horizontal stroke extending to the right.

Paul Cabot
GPTC Secretary
ANSI ASC GPTC Z380

Enclosure: GPTC Petition Attachment
cc: ASC GPTC/Z380

GPTC Petition Attachment

§ 192.321 Installation of plastic pipe.

(a) Plastic pipe must be installed below ground level except as provided by paragraphs (g), and (h) and (i) of this section.

(b) Plastic pipe that is installed in a vault or any other below grade enclosure must be completely encased in gas-tight metal pipe and fittings that are adequately protected from corrosion.

(c) Plastic pipe must be installed so as to minimize shear or tensile stresses.

(d) Thermoplastic pipe that is not encased must have a minimum wall thickness of 0.090 inch (2.29 millimeters), except that pipe with an outside diameter of 0.875 inch (22.3 millimeters) or less may have a minimum wall thickness of 0.062 inch (1.58 millimeters).

(e) Plastic pipe that is not encased must have an electrically conducting wire or other means of locating the pipe while it is underground. Tracer wire may not be wrapped around the pipe and contact with the pipe must be minimized but is not prohibited. Tracer wire or other metallic elements installed for pipe locating purposes must be resistant to corrosion damage, either by use of coated copper wire or by other means.

(f) Plastic pipe that is being encased must be inserted into the casing pipe in a manner that will protect the plastic. The leading end of the plastic must be closed before insertion.

(g) Uncased plastic pipe may be temporarily installed above ground level under the following conditions:

(1) The operator must be able to demonstrate that the cumulative aboveground exposure of the pipe does not exceed the manufacturer's recommended maximum period of exposure or 2 years, whichever is less.

(2) The pipe either is located where damage by external forces is unlikely or is otherwise protected against such damage.

(3) The pipe adequately resists exposure to ultraviolet light and high and low temperatures.

(h) Plastic pipe may be installed on bridges provided that it is:

(1) Installed with protection from mechanical damage, such as installation in a metallic casing;

(2) Protected from ultraviolet radiation; and

(3) Not allowed to exceed the pipe temperature limits specified in § 192.123.

(i) Plastic pipe may terminate above ground level at the inlet or outlet of a regulator or metering station if:

(1) The above ground level part of the plastic pipe is protected against deterioration and external damage;

(2) The plastic pipe is not used to support external loads; and

(3) The plastic pipe is not allowed to exceed the pipe temperature limits specified in § 192.123.