



July 29, 2015

Docket Management System  
U.S. Department of Transportation  
Docket Operations, M-30, Room W12-140  
1200 New Jersey Ave., SE  
East Building, Second Floor  
Washington DC 20590-0001

Re: Docket PHMSA-2014-0098

Dear Sir or Madam:

Evonik is pleased to provide comments in reference to the notice of proposed rulemaking that was published in the Federal Register, on May 21, 2015, under Docket No: PHMSA-2014-0098.

Evonik commends PHMSA on its continued mission to advance pipeline safety and appreciates the opportunity to provide comments.

Evonik concurs with the comments provided by the American Gas Association (AGA) and offers the following additional point(s) of emphasis:

1. Evonik kindly requests PHMSA to expand the table found in Sections 192.121(d)(2)(iv) and 192.121(e)(3) to include additional tubing sizes as shown below (*italicized*). The proposed change will ensure standardization of tubing sizes across the industry for all types of thermoplastic materials (PE and PA). The proposed changes are consistent with the request submitted by Evonik in its original petition to PHMSA.

<b>Pipe Size (inches)</b>	<b>Minimum Wall Thickness (inches)</b>	<b>Corresponding DR (values)</b>
<i>1/2" CTS</i>	<i>0.090</i>	<i>7</i>
<i>3/4" CTS</i>	<i>0.090</i>	<i>9.7</i>
<i>1/2" IPS</i>	<i>0.090</i>	<i>9.3</i>
<i>3/4" IPS</i>	<i>0.095</i>	<i>11</i>
<b>1" IPS</b>	<b>0.119</b>	<b>11</b>
<b>1-1/4" IPS</b>	<b>0.151</b>	<b>11</b>
<b>1-1/2" IPS</b>	<b>0.173</b>	<b>11</b>
<b>2" IPS</b>	<b>0.216</b>	<b>11</b>
<b>3" IPS</b>	<b>0.259</b>	<b>13.5</b>
<b>4" IPS</b>	<b>0.333</b>	<b>13.5</b>
<b>6" IPS</b>	<b>0.491</b>	<b>13.5</b>

2. Evonik would like to draw attention to unintended typographical error on Page 29265 (Vol. 80, No.98) of the Federal Register in the preamble section in Section D – Incorporation of PA-12. The preamble states:

“Allow a minimum wall thickness of at least 0.90 inches, ...”

Evonik believes the intent was to reference a minimum wall thickness value of ‘0.090” consistent with its original petition and the proposed additions shown above to Tables found in Sections 192.121(d)(2)(iv) and 192.121(e)(3).

In summary, Evonik fully supports the comments submitted by the AGA. Evonik kindly requests PHMSA to consider the additional points noted above, and sincerely appreciate the opportunity to comment on the proposed rulemaking.

Sincerely

A handwritten signature in black ink, appearing to read 'C. Schmidter', written in a cursive style.

Craig Schmidter  
Director, Growth Lines, Americas