

**BEFORE THE
UNITED STATES DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
WASHINGTON, D.C.**

Pipeline Safety: Gas
Plastic Pipe Rule

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Docket No. PHMSA-2014-0098

PETITION FOR RECONSIDERATION FOR THE PLASTIC PIPE RULE

AMERICAN GAS ASSOCIATION

DECEMBER 20th, 2018

I. Background

The American Gas Association, founded in 1918, represents more than 200 local energy companies that deliver clean natural gas throughout the United States. There are more than 73 million residential, commercial and industrial natural gas customers in the U.S., of which 95 percent — over 69 million customers — receive their gas from AGA members. Today, natural gas meets more than one-fourth of the United States' energy needs.

II. General Comments

AGA appreciates the time and effort expended by PHMSA to develop the language within the final rule on Pipeline Safety: Plastic Pipe Rule (Final Rule)¹. AGA supports PHMSA's amendments to federal pipeline regulations which take into consideration advancements in plastic pipe design, manufacturing, and technologies that advance public safety. Below, AGA provides recommendations which revise the language referencing technologies that are not readily available which makes it challenging to meet the regulation. AGA is also requesting that PHMSA allow Operators additional time to implement the Final Rule. The final rule requires a number of procedures to be modified, new programs to be created, and training to be conducted to ensure that the changes to the procedures and new programs are understood by employees. That cannot be done correctly by the current effective date. AGA does not believe this extension would compromise public safety in any manner.

III. Specific Comments

Availability of Category 1 Fittings

Currently, fitting manufacturers are not producing mechanical fittings that align with the requirements of Appendix B, §192.7 for larger pipe diameters. Therefore, AGA recommends that PHMSA limit the use of Category 1 fittings to plastic to plastic connections less than four inches in diameter until plastic to steel connection fittings are available. The current language allows Operators the flexibility to fuse pipelines in lieu of Category 1 joints, but does not provide an alternative for plastic to steel or plastic to cast iron connections. To address the issue of fittings not being available that meet PHMSA's final rule, AGA recommends the following revisions for §192.281(e)(4)

§ 192.281 Plastic pipe.

“(e) Mechanical joints. Each compression type mechanical joint on plastic pipe must comply with the following:

(1) The gasket material in the coupling must be compatible with the plastic.

(2) A rigid internal tubular stiffener, other than a split tubular stiffener, must be used in conjunction with the coupling.

(3) All mechanical fittings must meet a listed specification based upon the applicable material.

¹ Pipeline Safety: Plastic Pipe Rule, 83 Fed. Reg. 58694 (Nov. 20, 2018).

(4) ~~All~~ mechanical joints or fittings **less than 4-inch and** installed after January 22, 2019, must be Category 1 as defined by a listed specification for the applicable material, providing a seal plus resistance to a force on the pipe joint equal to or greater than that which will cause no less than 25% elongation of pipe, or the pipe fails outside the joint area if tested in accordance with the applicable standard.”

Training and Operator Qualifications

The current 60-day implementation window does not allow Operators adequate time to revise procedures, update training, facilitate training programs for both employees and contractors, and update any necessary qualifications needed to perform new practices. It is critical that all employees and contractors who are constructing or maintaining plastic pipeline systems receive the necessary training and qualifications to perform their work safely.

The new regulations also update pipe material and pipe joining specifications in Appendix B. Operators will need to review their existing specification, and if needed, update their specifications and communicate changes to their employees.

AGA is requesting that PHMSA allow Operators **an additional 90 days (until April 22, 2019)** to update their existing procedures, training, and operator qualifications to effectively meet the following requirements of the Final Rule:

- Joining plastic pipe with mechanical couplings and fittings as specified in §192.281(e)(3), §192.281(e)(4) §192.283, and §192.285.
- Installing service line compression couplings, for pipelines that are less than 4-inches, that meet the new criteria in §192.367 for category 1 connections.
- Ensuring that electrically isolated metal alloy fittings are protected and maintained in accordance with §192.455
- Fusing plastic pipe as specified within §192.756
- Using weak links while performing trenchless excavation as specified in §192.329

Modifications to Processes and Equipment from 3rd Party Suppliers

Operators will need to coordinate with suppliers to ensure the supplier’s testing and performance capabilities for pipe and pipe fittings are in accordance with the Final Rule. In addition, Operators must revise purchasing specifications and material installation instructions to meet the requirements in the Final Rule. To do this effectively, AGA is requesting that PHMSA allow Operators **an additional 90 days (until April 22, 2019)** to consult with third party vendors, and confirm their products align with the requirements within the Final Rule:

- Ensuring weak links for plastic pipelines meet the specification within §192.329
- Ensuring materials are handled in accordance with an Operators Storage and Handling program (§192.67).
- Ensuring plastic pipe components are designed to withstand anticipated loads and specifications of §192.143, §192.313, §192.145, §192.149, §192.375, §192.281(e)(3), §192.283, §192.285, §192.376, and §192.756.

- Ensuring that electrically isolated metal alloy fittings meet the design requirements specified in §192.455
- Revising purchasing specifications and material installation instructions

New Programs and Procedures

Some of the new regulations will also require Operators to develop new programs and procedures to adhere to the language within the Final Rule. AGA notes three examples in §192.329, §192.67, and §192.756 where Operators will need to develop new programs, and allocate resources to maintain these programs. AGA is requesting that PHMSA allow Operators **an additional six months (until July 22, 2019)**, to develop these programs and allocate appropriate resources to these new programs:

- Develop and implement a new program for using weak links in accordance with §192.329
- Develop and implement programs for the storage and handling of plastic pipe in accordance with §192.67
- Develop an equipment and maintenance program with written procedures, for all plastic pipe fusion equipment in accordance with §192.756

IV. Closing Remarks

AGA supports the enhancements outlined within the Final Rule which continue to enhance pipeline safety. AGA believes the recommendations made above do not compromise safety and allow Operators to use the best available technologies and tools to implement the enhanced plastic pipe regulations. By providing an extension on the rule requirements, PHMSA will allow operators additional time to thoughtfully and safely modify standards manuals, job functions, and training curriculums. **AGA respectfully requests that PHMSA respond to this petition no later than January 9, 2019.**

Thank you for your consideration of this request. Please contact me if you have any questions.

Respectfully submitted,
Date: December 20, 2018

A handwritten signature in black ink, appearing to read 'CS', with a long horizontal flourish extending to the right.

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