



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, D.C. 20590

**JUL 19 2018**

Mr. Peter A. Chace  
Gas Pipeline Safety Program Manager  
Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, Ohio 43215-3793

PHMSA-2018-0067

Dear Mr. Chace:

The Pipeline and Hazardous Materials Safety Administration (PHMSA) has reviewed your letter dated May 31, 2018, notifying us that NGO Transmission of the Energy Cooperative (NGOT) petitioned the Ohio Public Utilities Commission (Commission) for a State Waiver to waive compliance from the Pipeline Safety Regulations of 49 U.S.C 60118(d) and specifically, 49 CFR 192.53(c), 192.121, 192.123, 192.283(b), and 192.619(a), for NGOT to install and use a non-metallic, reinforced thermoplastic pipe manufactured by Specialty RTP, LLC (Specialty RTP).

NGOT proposes to use the four-inch reinforced thermoplastic pipe (RTP) to replace approximately 28,500 feet of six-inch bare steel natural gas transmission pipeline installed in 1955. The State Waiver segment covers the portion of the pipeline from NGOT's tap into Kinder Morgan's Tennessee Gas Pipeline (known as Spratt Station) in Rich Hill Township, Muskingum County, Ohio to NGOT's new McDonald Road Station in Salt Creek Township, Muskingum County, Ohio. The entire line is currently within a Class 1 location. The State Waiver segment is being designed and tested for a Maximum Allowable Operating Pressure (MAOP) of 1,000 psi. Typical operating pressure of the line currently is approximately 600 psi and varies anywhere from 500 psi to 790 psi coming out of the tap at Spratt Station.

NGOT asserts that its use of the RTP would improve the integrity of its system by eliminating corrosion, reducing environmental impact and cost of alternative construction methodologies, lowering maintenance costs and increasing resistance to third-party damage. The RTP is designed, manufactured and tested in accordance with American Petroleum Institute (API) Recommended Practice 15S "Qualification of Spoolable Reinforced Plastic Line Pipe" and meets the standards of ISO 9001 for quality management systems. The Commission is imposing several conditions in the areas of construction personnel qualification, installation, hydrotesting, corrosion control, and integrity management. Additional information on the application is available publicly via the Commission's Case Record 17-1751-GA-WVR.

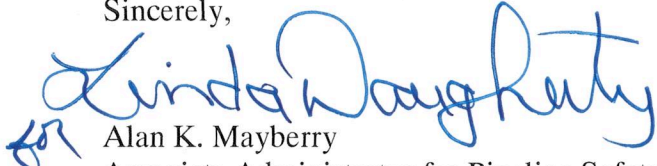
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After careful review of the technical merits of the request, PHMSA does not object to the approval of the Commission's NGO Waiver and the conditions imposed to maintain public and gas pipeline safety. PHMSA requests that the Commission forward a copy of the issued Waiver to PHMSA within 30 days of the final approval.

My staff would be pleased to discuss this decision or any other pipeline safety matter with you. John Gale, Director, Standards and Rulemaking Division, may be contacted at 202-366-4959 on regulatory matters, and Kenneth Lee, Director, Engineering and Research Division, may be contacted at 202-366-2694 on technical matters specific to this decision.

Sincerely,

  
for Alan K. Mayberry  
Associate Administrator for Pipeline Safety