



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

MAY 14 2019

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

Twinkle Andress Cavanaugh
President
Alabama Public Service Commission
P.O. Box 304260
Montgomery, Alabama 36130

PHMSA-2019-0097

Dear President Cavanaugh:

On April 15, 2019, pursuant to 49 United States Code (USC) § 60118(d), the Pipeline and Hazardous Materials Safety Administration (PHMSA) received a notification letter from the Alabama Public Service Commission (APSC), for a proposed waiver requested by Spire Alabama, Inc. (Spire). The proposed waiver by APSC to Spire would waive 49 Code of Federal Regulations (CFR) 192.625. Under USC § 60118(d), a State with a certification pursuant to § 60105 may waive compliance with a regulation. However, the State must give PHMSA notice of the waiver at least 60 days before its effective date. If PHMSA objects to the waiver, the waiver is stayed.

The waiver sought by Spire from APSC is for 95 feet of a new 6.625-inch diameter, 0.280-inch wall thickness, Grade X-52 steel gas pipeline with a maximum allowable operating pressure (MAOP) of 400 pounds per square inch gauge (psig). The pipeline is located on the grounds of a facility owned by the Hunt Oil Company in Tuscaloosa, Alabama and delivers gas to this facility. The 6.625-inch diameter pipeline is in a Class 3 location and is proposed to be operated without gas odorization. The waiver is being requested by Spire due to the fact that the 49 CFR 192.625 required gas odorant has a poisoning effect on Hunt Oil's hydrogen production process. Also, the 95 feet of 6.625-inch diameter pipeline is a lateral extending from an existing 12.75-inch diameter pipeline, that has an existing waiver from APSC for unodorized gas due to deliveries to the Hunt Oil Company facility.

The waiver conditions that APSC has proposed in its April 15, 2019, letter to PHMSA for the Spire 6.625-inch diameter pipeline are as follows:

- a) The pipeline will be installed, welded, and tested according to 49 CFR Part 192 requirements.
- b) The pipeline will be located on private property owned by Hunt Oil Company.
- c) The pipeline is in a Class 3 location. The only structures within 220 yards of the pipeline are industrial warehouse type facilities. There are no residences located within 220 yards of the pipeline. No customers other than Hunt Oil Company will be served off this pipeline.
- d) The pipeline will be marked with pipeline markers and will fall under Spire's damage prevention program.

PHMSA-2019-0097

- e) After installation the pipeline will be leak surveyed with flame ionization equipment every three months, which is the same survey condition for the existing 12.75-inch diameter pipeline.
- f) The pipeline will be under cathodic protection.

PHMSA has “no objection” to the APSC proposed waiver to be granted to Spire for the 95 feet of 6.625-inch diameter gas pipeline as described above and taken from the APSC April 15, 2019 letter to PHMSA. Therefore, the waiver may take effect upon APSC’s receipt of this letter. PHMSA requests that a copy of the revised order for Spire be forwarded to PHMSA within 30 days of the final approval.

If you wish to discuss this or any other pipeline safety matter, my staff would be pleased to assist you. Please call John Gale, Director, Standards and Rulemaking Division at 202-366-0434, for regulatory matters, or Buddy Secor, Acting Director, Engineering and Research Division at 202-493-0452, for technical matters

Thank you for your continued efforts in pipeline safety.

Sincerely,



Alan K. Mayberry
Associate Administrator for Pipeline Safety

MAY 14 2019