

CERTIFIED TRUE COPY

August 6, 1984

The Honorable Thomas A. Luken
House of Representatives
Washington, D.C. 20515

Dear Tom:

Thank you for your letter regarding the Sohio pipeline in Green Township, Ohio.

I share your concern for pipeline safety and value your ideas for improvements in our program. I have asked my newly appointed Administrator of the Research and Special Programs Administration, Cindy Douglass, to undertake a comprehensive review of our pipeline safety program and to make recommendations to me for its improvement. This review is to be comprehensive and is expected to take place over the next several months. Please be assured that your recommendations will be considered as part of this review.

In regard to your first recommendation calling for inspection of the pipeline, the Department's Materials Transportation Bureau (MTB), which administers pipeline safety regulatory functions, has been in touch with the Sohio Pipeline Company and Green Township officials regarding the Sohio Pipeline accident. On July 13, 1984, Sohio met with the local officials and subsequently prepared a profile of cover over the pipeline in the Township streets. Sohio has begun to lower the pipeline in areas where the cover was determined to be inadequate and proposes to prepare a similar profile on its other pipeline in the Township. MTB and the Green Township officials are satisfied with this course of action.

Your second recommendation is that the Department require all pipelines to meet reasonable maintenance standards, including a safe burial depth. The Department does have maintenance standards for gas and hazardous liquid pipelines (49 CFR Part 192, Subpart M, and Part 195, Subpart F). Although these maintenance standards do not require that any particular amount of cover be maintained, if an operator knows or should know that a pipeline has become unsafe because of inadequate cover, the standards require that appropriate remedial action be taken (49 CFR 192.703 and 195.401).

Proper cover over a buried pipeline is an important safety feature, because it distributes external loads and provides stability for the pipeline. Thus, the Department's standards for constructing new pipelines require adequate cover over buried pipelines (49 CFR 192.327 and 195.248). However, once installed, cover is costly and difficult to maintain, because of erosion and other surface altering activities. Moreover, the Department's pipeline accident data do not show any significant correlation between depth of cover and prevention of accidents due to digging. Although it seems reasonable to expect that adequate cover would reduce these types of accidents, there is not any evidence to support the proposition that maintaining original cover would be cost-effective as a general safety rule.

In contrast, experience has shown that measures such as linemarking, mapping, and advance coordination-of-digging activities provide an effective economical approach to damage prevention. The Federal safety standards now require operators of buried pipelines in rural areas to install permanent marking signs along the pipelines to show their location. Each sign provides a warning, the name of the operator, and a telephone number a person preparing to dig may call to learn more specific information about the pipeline. Another standard that became effective last year for gas pipelines in populated areas requires operators to provide a damage prevention program (49 CFR 192.614). Typically, under these programs a person calls a publicized

number before digging, and the pipeline operator provides specific temporary marking at the site. Such programs provide advance - coordination between operators and persons preparing to dig, and are often run in cooperation with operators of other underground utilities. MTB will be monitoring the effects of the various programs established under this new regulation before taking any further action to prevent outside force damage to buried pipelines.

MTB has learned that a "one call" damage prevention program is in effect in Green Township, but the road crew involved in the accident did not call before beginning to dig.

Again, thank you for allowing me the benefit of your views. Hook forward to working with you to improve pipeline safety.

With best wishes.

Sincerely,

Signed

Elizabeth Hanford Dole

Congress of the United States
House of Representatives
Washington, D.C. 20515

July 7, 1984

Elizabeth Hanford Dole
Secretary of Transportation
400 Seventh St., S.W.
Washington, D.C.

Dear Mrs. Dole:

As a member of the Energy Committee and as representative of the First District of Ohio, I am extremely concerned about the potentially disastrous condition of the Sohio pipeline in Green Township in my district.

My recommendations are:

- 1.) DOT should immediately require the contractor, Sohio, to inspect the pipeline from end to end in the urbanized areas, to determine if there are any other points where the pipeline is at or near the ground surface.
- 2.) Immediately propose and adopt regulations which would require all pipeline operators, even those built before 1972, to comply with reasonable standards for maintenance (including a safe depth) of all pipelines.
- 3.) If, in your opinion, legislation is needed for you to take these basic life saving actions, I will introduce such legislation forthwith.

On June 15, road crews penetrated the gasoline pipeline at a depth of approximately 6" below the street surface 9,000 gallons of gasoline spewed over the surrounding area, endangering 25-30 homes and their occupants.

There is every reason to believe that the pipeline is at or near the surface in nearby areas, also highly urbanized.

Yet, the operator, Sohio, has refused to make an inspection, relying on the defense that the pipeline location is generally marked by signs. In doing so, Sohio is ignoring the fact that warnings not to "excavate" are not sufficient to warn of dangerous pipelines only 6" deep. Reasonable people do not consider they are excavating at 6". In addition, if it is 6" at this point, at another point nearby it may be 4" or 3", because of erosion or settlement of structures.

As you know, many more of the 1,75 million miles of pipeline in this country were built 30 or 40 years ago. They are nearing the end of their life span. Therefore, we can expect the 1982 figures of 21 deaths, 272 injuries and 200 hazardous spills from pipelines to increase if DOT maintains a hands off policy while the operators stonewall pleas for safety.

Please advise as to your thoughts on the matter.

Sincerely yours,
Thomas A Luken, M.C.
1st Dist. Of Ohio