



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

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

NOV 3 2008

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T.R.A. DOCKET ROOM

Mr. Larry K. Borum  
Chief  
Gas Pipeline Safety Division  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

Dear Mr. ~~Borum~~ <sup>Larry</sup>:

The Pipeline and Hazardous Materials Safety Administration (PHMSA) reviewed your letter of July 23, 2008, notifying us that the Tennessee Regulatory Authority (TRA), granted Atmos Energy Corporation (Atmos) a waiver of compliance from 49 CFR §§ 192.121 and 192.123(a), as adopted by section 1220-4-5-48(2) of the TRA's rules, to allow for the utilization of a 0.40 design factor for certain polyethylene piping systems.

Under § 192.121, design pressure for plastic pipe is determined in accordance with specified formulas that incorporate a 0.32 design factor. Section 192.123(a) specifies that except as provided in paragraph (e), the design pressure may not exceed a gauge pressure of 100 psig (689 kPa) for plastic pipes in either distribution systems or Classes 3 and 4 locations. Section 192.123(e) allows for the design pressure of thermoplastic pipe to exceed 100 psig (689 kPa) provided the following conditions are met:

- Design pressure does not exceed 125 psig (862 kPa);
- The material is PE2406 or a PE 3408 as specified within ASTM D2513;
- The pipe size is nominal pipe size (IPS) 12 or less; and
- The design pressure is determined in accordance with the design equation defined in § 192.121.

The waiver allows for Atmos to increase the design factor specified in § 192.121 from 0.32 to 0.40 for polyethylene piping systems that are subject to approval from the TRA. To ensure safety, Atmos will increase the minimum thickness for the thermoplastic pipe, specified in § 192.123(c), from 0.062 inches (1.57 millimeters) to 0.090 inches (2.29 millimeters). In addition, the waiver allows for the use of the latest generation of polyethylene pipe (PE2708, PE3710 and PE4710) material in place of the PE 2406 or PE 3408, which is currently required in § 192.123(e).

PHMSA does not object to the waiver of §§ 192.121 and 192.123 under the conditions specified above and as detailed in your July 23, 2008 request, including the background information (e.g., TRA Docket 07-00251 and the Amended Petition of Atmos).

For clarity purposes, PHMSA requests that the use of PE2708, PE3710, and PE4710 materials be required for all pipe operated under a design factor of 0.40 in accordance with this waiver.

If you wish to discuss this special permit or any other pipeline safety matter, my staff would be pleased to assist you. Please call John Gale, Director of Regulations (202) 366-0434, for regulatory matters or Alan Mayberry, Director of Engineering and Emergency Support at (202) 366-5124, for technical matters.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Wiese", with a large, stylized initial "J" and "W".

Jeffrey D. Wiese  
Associate Administrator for Pipeline Safety