

TENNESSEE REGULATORY AUTHORITY



460 James Robertson Parkway
Nashville, Tennessee 37243-0505

January 20, 2011

Mr. Jeff Wiese, Assistant Administrator/Chief Safety Officer
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
East Building, 2nd Floor, Mail Stop: E24-455
1200 New Jersey Ave., SE
Washington, DC 20590

RE: Request for Waiver of Sections 192.53(c), 192.121, 192.123, and 192.619(a) of Part 192 of U.S.C. Title 49 by Renewco Meadow Branch, LLC. TRA Docket Number 10-00195.

Dear Mr. Wiese:

Please find enclosed the order of the Tennessee Regulatory Authority (TRA) relative to the above referenced matter. We are submitting the order and petition of Renewco Meadow Branch, LLC (Renewco-MB) for review and action in accordance with 49 USC 60118(a). Renewco-MB requests action on this matter to allow for installation and operation of glass reinforced epoxy (GRE) thermoset pipe in its high pressure natural gas pipeline application.

In accordance with the requirements of the Guidelines for States Participating in the Pipeline Safety Program, information is provided as follows:

1. Name, address and telephone number of the applicant-

Charles B. Welch, Jr.
618 Church Street, Suite 300
Nashville, TN. 37219
Telephone: (615) 726-1200

Allen Spivey
Director, Office of Corporate Engineering
10 Peachtree Place, 11th Floor
Atlanta, GA 30309

2. The safety regulation involved-

Renewco-MB has requested a waiver from the requirements of sections 192.53(c), 192.121, 192.123, and 192.619(a) to allow for installation and operation of glass

reinforced epoxy (GRE) thermoset pipe in its high pressure natural gas pipeline application.

3. A description of the pipeline facilities involved-

Renewco-MB proposes to construct approximately nine (9) miles of high pressure pipeline designed for a single-purpose, point-to-point transport of natural gas (no service taps or branch feeds) with a maximum operating pressure of 700 pounds per square inch gage (psig). The pipe material proposed is Fiberspar FS LPJ 4½" 1500 (E) LinePipe.

4. The justification for approving the waiver, including the reasons why the regulations are not appropriate and why the waiver is consistent with pipeline safety-

For reinforced thermosetting plastic pipe, section 192.121 restricts the hydrostatic design basis (HDB) to 11,000 psi. A Technical Review Board was formed to review pertinent test and product standards and provide a recommendation on the Long-Term Hydrostatic Strength (LTHS) for Fiberspar LinePipe Spoolable Composite Pipe and corresponding HDB. Based on the established LTHS, the Technical Review Board agreed that the HDB at 140° F is 31,500 pounds per square inch (psi) for time periods of 11, 20 and 50 years based on ASTM D2992-06.

Using the formula $P = 2S(t/D-t)DF$ in §192.121 and calculating for design pressure, using an HDB (S) of 31,500 psi, a design factor (DF) of 0.32 and a specified wall thickness (t) of 0.178 inches results in a design pressure of approximately 847 psig. Renewco-MB states that the maximum operating pressure for the pipe will be 700 psig. According to manufacturer information, this pipe has a recommended maximum operating pressure of 1,500 psi based on a minimum 20-year service life using ASTM D2992 long term test procedures.

The Fiberspar LinePipe meets American Petroleum Institute RP 15S along with other industry standards. The fiberglass reinforced pipe does not corrode so there is a reduced need for corrosion control. In addition, the pipe is supplied in spools containing up to 4,500 feet of 4½" diameter pipe. This results in a reduced number of pipe joints and fewer potential points of leakage. As previously stated, this is a point-to-point transport of natural gas that does not include service taps or branch lines. Use of the Fiberspar LinePipe will also reduce construction time and property restoration after the construction.

The TRA's order requires Renewco-MB to comply with conditions and limitations as follows:

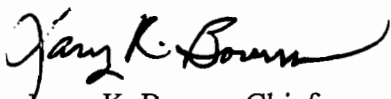
1. RMB will notify the TRA Gas Pipeline Safety Division ("GPSD") of a class location change that would result in the transmission line being subject to the requirements of §192.625(b).
2. The use of Fiberspar will not be permitted in class 3 or 4 locations.
3. Material used in the manufacture of the pipe installed within the special permit segment, during construction or in future repairs or replacement, shall not contain any regrind or rework material.
4. RMB shall perform external corrosion control monitoring on each buried metallic fitting in accordance with 49 CFR §192.465(a). Cathodic protection test stations will be provided at each metallic connector.
5. RMB shall submit construction specifications for the special permit segment to the GPSD prior to the start of construction operations.
6. RMB shall notify the GPSD prior to the start of construction operations of the date and location of pipeline installation.
7. RMB shall notify the GPSD if: any repairs or modifications to the Fiberspar pipe or fittings are required; or the special permit segment is at any time damaged or hit.
8. RMB shall schedule and perform three inspections conducted at five years, ten years, and twenty years following installation, which shall include non-destructive and destructive testing on the pipe material to determine that characteristics have not degraded outside the predicted parameters.
9. If the tests required by condition No. 8 determine that the pipe material is no longer suited for service in this application, RMB will replace it with steel pipe or the project will be abandoned.
10. RMB will notify the GPSD of the results of the tests conducted as required by condition No. 8.
11. RMB will require personnel involved in the construction or repair of the pipe to be qualified in these tasks with necessary emphasis given to procedures unique to the GRE pipe material.
12. RMB shall make every effort to maintain the GRE pipe operating temperatures at or below 120 degrees Fahrenheit. In the event operating temperatures exceed 140 degrees Fahrenheit for any period of time, the pipeline will be shut down and notice of the event provided to the GPSD within 24 hours for a determination of appropriate requirements for continued service of the pipeline.
13. RMB shall stock tools, fittings and materials for operational maintenance and emergency repairs of the pipeline.
14. RMB shall install line-of-site pipeline markers in all areas except agricultural areas where line-of-site markers are not practical.
15. RMB shall file a copy of the Special Permit and any final Orders issued by PHMSA in this docket.

Considering the above factors, the waiver request is consistent with pipeline safety. Therefore, approval of this waiver would be consistent with pipeline safety efforts.

We understand that the TRA's order will be effective upon approval or if the TRA does not receive a response from the Federal Office of Pipeline Safety within sixty days of receipt of the order.

If you have any questions regarding this matter, please contact Richard Collier, General Counsel, at 1-800-342-8359 extension 170 or me at extension 185. Your prompt response to this request is appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry K. Borum". The signature is fluid and cursive, with the first name "Larry" and last name "Borum" clearly distinguishable.

Larry K. Borum, Chief
Gas Pipeline Safety Division

Enclosures: RMB Petition (CD) and TRA Order (attached)

c: Richard Collier, TRA General Counsel
Wayne Lemoie, OPS-Southern Region
Charles B. Welch, Jr., Esq.
Allen Spivey, Director, Office of Corporate Engineering
TRA Docket File No. 10-00195