



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, DC 20590

MAR 07 2019

Ms. Christina Sames
Vice President, Operations and Engineering
American Gas Association
400 North Capitol Street, NW
Washington, DC 20001

RE: Petition for Reconsideration for the Plastic Pipe Rule.

Dear Ms. Sames:

On November 20, 2018, the U.S. Department of Transportation's Pipeline and Hazardous Materials Safety Administration (PHMSA) issued a final rule that amended the federal pipeline safety requirements for the design, construction, and maintenance of plastic piping systems used in the transportation of natural or other gas (83 FR 58694). On December 20, 2018, the American Gas Association (AGA) submitted a Petition for Reconsideration (Petition) pursuant to 49 CFR 190.335. In the Petition, AGA requested that PHMSA (1) extend the compliance deadline for certain regulations and (2) exempt mechanical fittings with nominal pipe sizes of 4 inches or greater from 49 CFR 192.281(e)(4). For the reasons discussed below, PHMSA grants the Petition in part.

Requests for Extended Compliance Deadlines

PHMSA grants the requests in the Petition to extend the compliance deadline for certain regulations to give operators and manufacturers adequate time to develop procedures, design and test equipment, and implement training programs to meet the requirements in the final rule. PHMSA has determined that the compliance deadlines suggested in the Petition are appropriate and do not compromise safety. AGA requested an additional 90 days to implement training and operator qualification programs for the new requirements, an additional 90 days to work with equipment suppliers, and an additional six months to comply with certain provisions that require the development of new programs.

The new compliance deadlines requested in the petition are summarized in the table below:

Topic	Sections	New compliance deadline
Joining plastic pipe with mechanical couplings.	§§ 192.281(e)(3), 192.281(e)(4), 192.283, and 192.285	April 22, 2019 (90 days)
Installing service lines with compression couplings.	§ 192.367	April 22, 2019 (90 days)
Implementing corrosion control for electrically isolated metallic fittings.	§ 192.455	April 22, 2019 (90 days)
Maintaining equipment used to join plastic pipe.	§ 192.756	April 22, 2019 (90 days)
Requirement for devices and components to withstand anticipated loads and meet listed specifications.	§§ 192.143, 192.313, 192.145, 192.149, 192.375, 192.281(e)(3), 192.283, 192.285, 192.376	April 22, 2019 (90 days)
Cathodic protection design for isolated metallic fittings.	§ 192.455	April 22, 2019 (90 days)
Develop and implement programs for using weak links.	§ 192.329	July 22, 2019 (six months)
Develop and implement programs for storing and handling plastic pipe.	§ 192.67	July 22, 2019 (six months)
Develop programs for maintaining joining equipment.	§ 192.756	July 22, 2019 (six months)

Request to Limit Applicability of Category 1 Fittings

In its Petition, AGA raises specific concerns about the category 1 requirements for larger-diameter mechanical joints between plastic and metallic pipe and the applicability of § 192.281(e)(4). While PHMSA appreciates AGA's concerns, it has determined that limiting applicability of category 1 requirements to joints on plastic pipe below 4 inches in nominal pipe size is beyond the issue of plastic to metallic connections raised by AGA and therefore, not appropriate. To better accommodate compliance with this requirement, for joints between metallic and plastic pipe with a nominal pipe size of 4 inches or greater, PHMSA will delay the compliance deadline for category 1 requirements in § 192.281(e)(4) until January 22, 2020. This provides additional time to develop and test larger mechanical joints that can meet the category 1 performance standard.

PHMSA is in the process of drafting a formal response to this petition that will be published in the Federal Register in accordance with 49 CFR 190.337(b). That document will include the amendments necessary to respond to the petition.

Thank you for your petition. If you require further assistance, please contact John A. Gale, Director, Standards and Rulemaking Division at 202-366-0434.

Sincerely,

A handwritten signature in blue ink, appearing to read "Alan K. Mayberry".

Alan K. Mayberry
Associate Administrator for Pipeline Safety