

STATE OF ALABAMA
ALABAMA PUBLIC SERVICE COMMISSION
P.O. BOX 991
MONTGOMERY, ALABAMA 36130

March 22, 1976

Mr. Cesar DeLeon, Acting Director
Office of Pipeline Safety Operations
Department of Transportation
Washington, D.C. 20590

Dear Mr. DeLeon:

Enclosed is a request for a waiver for the gas system of Trussville, Alabama to run 3,125 feet of 6-inch pipe unodorized.

Enclosed is the information they gave us requesting this waiver. Your prompt consideration would be appreciated.

Sincerely,

(signed)
Larry E. Waldrop
Administrator
Gas Pipeline Safety

LEW/jr

Enclosure

*Enclosure to 03/22/76 letter from
Alabama Public Service Commission*

UTILITIES BOARD
CITY OF TRUSSVILLE
ALABAMA

October 1, 1975

Alabama Public Service Commission
P.O. Box 99
Montgomery, Alabama

Gentlemen:

We are presently constructing a liquefied natural gas facility 3,125 feet from our Trussville No. 2 meter station, near Lovick, Alabama.

Unodorized 500 psig gas is desirable for this process. No customers will be served from this plant inlet line, and all gas leaving the plant will be odorized.

We respectfully request your permission to install 3,125 feet of 6 inch - 500 psig unodorized gas line, as shown on the attached drawings.

Your favorable consideration will be greatly appreciated.

Yours very truly,

(signed)
Charles G. Fincher

cgf/jb

For attachments (drawings) referenced in letter, see paper copies available in Office of Pipeline Safety file.

*Enclosure to 03/22/76 letter from
Alabama Public Service Commission*

UTILITIES BOARD
CITY OF TRUSSVILLE
ALABAMA

March 19, 1976

Alabama Public Service Commission
P.O. Box 99
Montgomery, Alabama

Gentlemen:

We are presently constructing a liquefied natural gas facility 3,125 feet from our Trussville No. 2 meter station, near Lovick, Alabama.

The following is a list of some of the items which make it desirable to receive unodorized 500 psig gas inlet for this process:

1. Sulfur compounds, mercaptans, in the inlet gas breakdown to H₂S in the presence of heat. H₂S would combine with oxygen present in the natural gas to form SO₂. At high enough SO₂ concentrations, corrosion becomes a major factor.

2. Any odor in the plant inlet feed drops out in the early phase of the refrigeration process and is returned back to distribution system before the liquefaction of natural gas which is stored in the tank. Thus the LNG in the tank is essentially free of odor.
3. High sulfur concentrations, mercaptans, returned to the distribution system may cause peaking.
4. In facilities where molecular sieve beds are used for pre-treatment, sulfur, mercaptans, drastically reduce the sieve life and capacity of the sieves to absorb CO₂ if the concentration levels are higher than design.

In addition to the above items, our facility is equipped with combustible gas detectors with an associated combustible gas alarm system spread throughout the plant capable of detecting leaks and sounding an alarm. Thus, the safety aspects of odorizing the gas is covered with the gas detecting and warning system.

No customers will be served from this plant inlet line, and all gas leaving the plant will be odorized.

We respectfully request your permission to install 3,125 feet of 6 inch - 500 psig unodorized gas line, as shown on the attached drawings.

Your favorable consideration will be greatly appreciated.

Yours very truly,

Charles G. Fincher

cgf/jb

There is no OPS response in the file; see "Outgoing Attachments/Comments" for analysis of petition by Chief, Technical Division.

UNITED STATES GOVERNMENT
Memorandum

DEPARTMENT OF TRANSPORTATION
MATERIALS TRANSPORTATION BUREAU

DATE: **JUN 18 1976**

TO: Chief, Regulations Division, MTP-30

FROM: Chief, Technical Division, MTP-10

SUBJECT: Alabama Public Service Commission waiver to the Utilities Board of Trussville, Alabama, from the Requirements of 192.625 for 3,145 feet of 6-inch Distribution Pipeline.

The Technical Division has reviewed the waiver granted by the Alabama Public Service Commission to the Utilities Board of Trussville, Alabama, from the requirements for odorization in 192.625, along with the request and justification submitted by the operator.

The data submitted with the petition for waiver did not include the design information on the pipe and fittings for this proposed pipeline. This information was, subsequently, obtained by calling the pipeline operator (See the attach Record of Telephone Call). From the data obtained, it appears that the proposed line will be a transmission pipeline, as defined in 192.3, by being part of a transmission line that transports gas from gathering line to a storage facility and also from a stress level at MAOP of 21.6% of SMYS. Since the operator has advised that the location of this pipeline is a Class 1 location and gas in transmission pipelines is only required to be odorized in Class 3 and 4 locations it does not appear that a waiver is needed.

(signed)
Frank E. Fulton

Attachment

No copy was attached of the Record of Telephone Call referenced in the memo.