

May 4, 1987

Mr. Robert E. Stone, P.E.
Chief, gas pipeline Safety
State of Ohio
Public Utilities Commission
180 East Broad Street
Columbus, Ohio 43266-0573

Dear Mr. Stone:

Your letter of December 18, 1986, and February 6, 1987, to Edward Ondak, transmitting a request by the West Ohio Gas Company for waiver of the cathodic protection monitoring requirements of 49 CFR 192.465(a) and (d), have been referred to our Washington office for consideration. The company has requested a waiver because 178 cathodic protection test points on its system have been lost or damaged through construction activity.

We welcome the opportunity to confer with you about the merits of the company's waiver request before it is officially acted upon by the State. Early communication is particularly useful in this case because we think that a waiver is not appropriate under the circumstances described in the West Ohio application.

A waiver is indeed for situations where an operator shows good reasons why a generally applicable safety standard should not be applied to a particular operation, or why an alternative safety practice would be more appropriate under the circumstances. In addition, the operator must show why the proposed waiver would not be inconsistent with pipeline safety. A waiver should not be used to cure a violation of a safety standard that the operator is taking steps to meet.

In the present case, it does not appear that West Ohio wishes to operate its pipeline system in a manner different from what is required by Part 193. Rather, the company found itself out of compliance with §192.465(a) and (d), and has proposed to execute a plan that will restore compliance. Your response to this plan properly lies within your powers to administer enforcement of the standards. If you believe the company has acted in good faith and is not at fault for the noncompliance, you might choose to defer imposition of a civil penalty pending the successful outcome of the company's plan. This action can be taken apart from granting a waiver. On the other hand, if the company is at fault, some combination of penalty and plan of compliance may be appropriate.

Again, we thank you for this chance opportunity to comment on the waiver request. Under Section 3(d) of the natural Gas Pipeline Safety Act of 1968, the effect of our objections to the proposed waiver is to state any section which the Commission may subsequently take to grant the waiver. As provided by the statute, you may ask us to reconsider our objections and request a hearing on the matter.

Sincerely,
Original Sign By
Richard L. Beam
Director
Office of Pipeline Safety

Memorandum
U.S. Department of Transportation

Date: February 12, 1987

Subject: ACTION: West Ohio Gas Company Request for Waiver

From: Howard J. Ondak, Chief, Central Region, DPS-6

To: Richard Beam, Director, Office of Pipeline Safety, OPS-1

The attached addendum should be self-explanatory. Previously I had mailed you a copy of West Ohio Gas's request for a waiver, requesting your approval. The addendum should address-the questions posed by you and I once again request your concurrence.

STATE OF OHIO
PUBLIC UTILITIES COMMISSION
180 EAST BROAD STREET
COLUMBUS, OHIO 43266-0573

February 5, 1987

Mr. Edward J. Ondak, P.E.
Chief, Central Region Pipeline Safety
Materials Transportation Bureau
911 Walnut Street
Kansas City, MO 64106

Subject: West Ohio Gas Company Request for Waiver

Dear Mr. Ondak:

Attached hereto is an addendum to the West Ohio Gas Company request for a waiver for CFR Subpart I 192.465 A. The original request was forwarded December 18, 1986.

We have reviewed the addendum and have concluded it does not change the original request, it only seeks to clarify some of the wording.

Our intention to grant the waiver remains the same.

In accordance with paragraph (d) of Section 3 of the National Gas Pipeline Safety Act of 1968, we request your concurrence or comment on our position to grant the request of waiver to West Ohio Gas Company.

Sincerely,
Robert S. Stone, P.E.
Chief, Gas Pipeline Safety

WEST OHIO GAS COMPANY
319 WEST MARKET STREET
LIMA, OHIO 45802-0149

February 3, 1987

Mr. Robert S. Stone, P.E.
Chief, Gas Pipeline Safety Section
Compliance Division-Consumer Service Department
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43266-0573

Re: Addendum to Waiver

Dear Bob:

In reviewing our request for a Waiver for CFR Subpart I 192.465.a, we find that the wording may cause confusion for those responsible for interpreting our request.

This portion of the Waiver request involves "Monitoring". Our intent is to seek a Waiver from monitoring those test points which have been lost or damaged due to utility construction, road work, walk replacement, etc. We will continue to monitor all existing test points in compliance with 465.a.

On January 29, 1987, we completed inputting all data into our new computerized record system. Our reports indicate that there are 170 test points which could not be monitored during the 1986 monitoring program. These are the test points upon which we have filed a Waiver request.

The re-establishment of these "lost" test points is receiving our highest priority in correction activity planning. Plans are in place to complete the re-establishment of these test points as early as possible in 1987. These test points will be monitored as they are re-established and they will then be included as part of permanent monitoring data base.

During the interim, reports will be generated to track our progress in reestablishing and monitoring these test points and these reports will be made available to PUCO auditors.

We apologize for any confusion this matter may have created and offer this addendum as clarification for your review.

Sincerely,
Rich Zalenko
Manager of Operations

CORROSION CONTROL STATUS REPORT

DATA AS OF _JANUARY 29, 1987_

TOWN/SYSTEM	TOTAL T.STA.	TOTAL T.STA. <CRITR.	TOTAL CP FTGE	TOTAL =>CRITR. FTGE	TOTAL <CRITR. FTGE
MIDDLEPOINT DIST	12	0	20,300	20,300	0
DELPHOS DIST	118	21	71,250	61,090	10,160
BEAVERDAM TR&DIST	43	0	30,750	30,750	0
BLUFTON DIST	98	9	103,052	96,258	6,774
CAIRO DIST	44	3	24,850	20,950	3,900
CELINA	132	18	163,412	142,976	20,436
CEL-MONTX TR	29	1	48,330	47,230	1,100
COLDWATER TR	4	3	2,900	800	2,100
COLUMBUS GROVE DIST	44	5	44,802	38,462	6,340
GLANDORF DIST & TR	37	5	49,182	44,752	4,430
LAFAYETTE DIST	14	0	14,070	14,070	0
LAFAYETTE TR	14	0	21,872	21,872	0
LEIPSIC DIST	52	1	49,860	48,760	1,100
MONTEZUMA DIST	53	6	94,462	84,022	10,440
OTTAWA DIST	57	3	98,210	65,010	3,200
PANDORA TR & DIST	63	3	45,594	43,464	2,130
ST. HENRY DIST	17	3	34,270	28,280	5,990
ST. MARY'S DIST	48	11	172,312	132,086	40,226
SCOTT-HAVLD TR	12	0	11,771	11,771	0
SPENCERVILLE DIST	56	5	69,960	63,410	6,550
SPENCERVILLE TR	49	1	50,600	49,540	1,060
W. LEIPSIC DIST	16	0	10,020	10,020	0
WESTIMINSTER DIST	11	1	10,872	10,192	680
WILLSHIRE DIST	19	2	19,200	18,430	770
KENTON DIST	191	52	153,030	119,780	33,250
SCOTT DIST	10	2	14,990	12,760	2,230
HAVILAND DIST	9	1	13,430	12,650	780
ROCKFORD DIST	17	0	28,830	28,830	0
OHIO CITY DIST	16	0	32,720	32,720	0
CONVOY DIST	39	8	26,730	20,310	6,420
ELIDA DIST	69	22	53,960	41,860	12,100
VAN WERT DIST	177	39	161,580	125,700	35,880
LIMA DIST (872)	23	2	17,590	16,060	1,530
LIMA DIST (875)	36	8	29,150	24,860	4,290
LIMA DIST (922)	11	0	8,580	8,580	0
LIMA DIST (921)	24	8	31,120	21,150	9,970
LIMA DIST (944)					
(848) (901) (849)	53	11	48,920	40,250	8,670
KOSSUTH TR & DIST	17	0	25,190	25,190	0
LIMA DIST (873)	37	17	35,210	19,740	15,470
LIMA DIST (945)	7	0	6,300	6,300	0
LIMA DIST (851)	32	5	32,070	27,040	5,030
LIMA DIST (899-919)	7	1	24,790	19,560	5,230
LIMA DIST (897)	28	11	23,900	15,520	8,380

LIMA DIST (898)	30	18	19,390	7,740	11,650
LIMA DIST (920)	38	6	58,710	52,420	6290
LIMA DIST (896)	18	2	18,670	16,420	2,250
LIMA DIST (896-877)	17	2	25,760	21,490	4,270
LIMA DIST (850)	87	19	60,382	48,202	12,180
20" TRANSMISSION	28	0	20,300	20,300	0
LIMA DIST (874)	28	20	17,197	4,778	12,419
LIMA DIST (804-828)	12	0	16,310	16,310	0
WILLSHIRE TRANS.	34	0	38,420	38,420	0
WAPAK TRANS.	58	7	45,099	42,273	2,826
LIMA-VAN-WERT TR.	140	1	138,147	137,702	445
OTTAWA-LEIPSIC TR.	31	1	45,630	42,990	2,640
LIMA DIST (827)	11	5	16,910	7,580	9,330
LIMA DIST (923)	6	3	16,600	3,450	13,150
COLD-HENRY-PHIL TR	11	4	12,160	7,360	4,800
LIMA-CAIRO TR	19	0	21,384	21,384	0
CAIRO-COL. GRV TR	47	2	39,626	37,796	1,830
CONVOY-V. WERT TR	65	1	68,258	68,248	10
COLGRV-OTTAWA TR	37	2	92,894	61,527	1,367
DELPHOS TR	63	7	53,327	50,292	3,035
LIMA EAST BELT	34	6	34,401	28,826	5,575
LIMA BELT 10 TH -BUCKY	57	4	47,941	43,841	4,100
LIMA NORTH BELT	13	0	16,688	16,688	0
LIMA WEST BELT	37	7	34,807	32,241	2,566
BLUFTON TR	37	0	82,919	82,919	0
LIMA DIST (946-969-970)	11	1	10,550	9,330	1,220
LIMA DIST (826)	5	2	8,380	4,130	4,250
LIMA-CELINA TR	172	16	159,109	155,392	3,717
WAPAKONETA DIST	177	54	123,640	89,740	33,900
TOTALS	3166	483	3,313,600	2,893,164	420,436

NOTE: THIS COMPLETES THE DAT INPUT FOR THE EXISTING SYSTEM....

Memorandum
U.S Department of Transportation
Research and Special Programs Administration

Date: January 6, 1987

Subject: ACTION: State of Ohio Request for Approval of Waiver

From: Howard J. Ondak , Chief, Central Region, DPS-6

To: Richard Beam, Director, Office of Pipeline Safety, DPS-1

The attached is a request from the state of Ohio regarding a waiver being sought by the West Ohio Gas Company.

I am familiar with the corrosion problems that West Ohio Gas (WOG) is experiencing and did meet with WOG to discuss them. I explained that the only course of action I could see was for WOG to request a waiver. Subsequently, I met with the state of Ohio and told them that I would help them through the process since this was their first encounter with a waiver request.

The state of Ohio is proposing to grant the waiver and I can see no problem with their proposal. In accordance with Section 3 of the Natural Gas Pipeline Safety Act of 1968, as amended, I am submitting this request for your consideration.

STATE OF OHIO
PUBLIC UTILITIES COMMISSION
180 EAST BROAD STREET
COLUMBUS, OHIO 43266-0573

December 18, 1986

Mr. Edward J. Ondak, P.E.
Chief, Central Region Pipeline Safety
Materials Transportation Bureau
911 Walnut Street
Kansas City, MO 64106

Subject: West Ohio Gas Company Request for Waiver

Dear Mr. Ondak:

Attached hereto is a "Request for Waiver" received from West Ohio Gas Company. The Gas Pipeline Safety Division believes the request for waiver is proper and we here in Ohio will grant this request.

In accordance with paragraph (d) of Section 3 of the National Gas Pipeline Safety Act of 1968, we request your concurrence or comment on our position to grant the request of waiver to West Ohio Gas Company.

If additional information is desired, please contact us.

Sincerely,
Robert S. Stone
Chief, Gas Pipeline Safety

WEST OHIO GAS COMPANY
319 WEST MARKET STREET
P.O. BOX 149
LIMA, OHIO 45802

December 9, 1986

Mr. Robert S. Stone, P.E.
Chief, Gas Pipeline Safety Section
Compliance Division-Consumer Services Department
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43266-0573

Re: Request for Waiver

Dear Bob:

West Ohio Gas Company (WOGC) hereby petitions the Public Utilities Commission of Ohio (PUCO) for a waiver of compliance for a limited period of time from parts of 49 CFR, Part 192, Subpart I, specifically Section 192.465(a) and Section 192.465(d) of said Subpart.

192.465(a) requires in part that each pipeline that is under cathodic protection must be tested at least once each calendar year with intervals not exceeding fifteen months ...

192.465(d) requires that each operator shall take prompt remedial action to correct any deficiencies indicated by the monitoring.

In reviewing data pertinent to Sections 192.465(a) and 192.465(d) WOGC finds that to some extent portions of our system are not presently in "C" compliance with the aforementioned sections of Subpart I.

WOGC has a procedure to look at all test points with a potential less than one volt. This procedure would give WOGC an indication of when potentials were decreasing due to possible depletion of anodes and still keep the company in compliance with the 850 millivolt criteria. Recent developments in the cathodic protection industry, e.g. close interval surveys, disclosed that even though the test points may be adequate there were some areas along the pipeline where potentials may be below the published criteria.

In response to these findings WOGC has put in place a computerized record system designed to up-date their present monitoring program format and determine the degree of any noncompliance involved.

Inputting of all data has a completion target date of June 1, 1987. This new system replaces the manual record system originally established in 1956 and up-dated in 1976.

As reports and other data are generated by this new system, projects for remedial action will be designed that will bring the piping system into compliance.

The record system will continue to furnish data that will direct planning for maintaining compliance in future years.

To the best of our ability, based on the data presently available, it is the estimate of WOGC that the remedial work will involve a time frame of approximately four (4) years. During that period of time remedial action will be taking place using a system of priorities focused on public safety and service to their customers. Summaries of the planned projects and the time tables for this work will be available for review by PUCO inspectors.

Durin the interim period sections of piping not presently in compliance will be reviewed and leak section will be increased from normal scheduling formats where public safety might be involved.

To further support the total Corrosion Control Program, WOGC has in place a computerized Leak Management System which provides data relevant to Leak Repair Orders and completed repairs made to piping and caused by corrosion.

This system also identifies pipe repairs made to coated pipe which has cathodic protection applied. Prompt remedial action will be initiated within ninety (90) days on any section off his category of piping where monitoring has indicated that the level of cathodic protection is not in compliance with existing CFR criteria.

During the waiver period WOGC will be producing reports and summaries that will track their progress in achieving compliance.

This data will be available to PUCO inspectors for their review and evaluation.

Following the waiver period the same data will be generated to track our continuing efforts and programs directed to maintaining compliance levels as well as evaluating their total Corrosion Control Program.

WOGC feels that this waiver request is in the best interest of public safety and will afford the company an effective and economical solution for an excellent corrosion control program.

Your immediate consideration and granting of this waiver would be appreciated.

Very truly yours,
Rich Zelenko
Operations Manager