

U.S. Department of Transportation  
Research and Special Programs Administration  
400 Seventh Street, S.W.  
Washington, D.C. 20590

JUL 31 1997

Mr. H. Russell Frisby, Jr.  
Chairman  
Maryland Public Service Commission  
William Donald Schaefer Tower  
6 St. Paul Street  
Baltimore, MD 21202-6086

Dear Mr. Frisby:

We have considered your letter of June 23, 1997, notifying us the Commission will grant Columbia Gas of Maryland, Inc. a waiver from complying with 49 CFR 192.619(a)(2)(ii) for two segments of a steel high-pressure gas supply system in Hagerstown, Maryland, that was uprated in 1982. The waiver will permit Columbia Gas to maintain the uprated maximum allowable operating pressure (MAOP) of 175 psig on each segment.

Columbia sought the waiver because of its inability to verify, through installation test records or testimony, that the uprated MAOP of the segments is not higher than the maximum allowed by 49 CFR 192.619(a)(2)(ii). This maximum is calculated as a percentage of test pressure.

Columbia's waiver request shows that at the time of installation, it intended to eventually operate the entire system at 175 psig, but initially established 60 psig as the MAOP of the two segments. Moreover, installation test records that support operation at 175 psig are available for the remainder of the high-pressure system. We believe the existence of these test records in light of the originally intended operating pressure shows a strong likelihood that the two segments were tested like the remainder of the system. In view of this likelihood and the apparently excellent maintenance history of the segments, we have no objection to the waiver.

Sincerely,  
Richard B. Felder  
Associate Administrator for Pipeline Safety

STATE OF MARYLAND  
PUBLIC SERVICE COMMISSION  
WILLIAM DONALD SCHAEFER TOWER  
6 ST. PAUL STREET  
BALTIMORE, MARYLAND 21202-6806  
(410) 767-8000  
FAX NUMBER (410) 333-6495

June 23, 1997

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Richard B. Felder  
Associate Administrator For Pipeline Safety  
DOT/RSPA/OPS  
400 7th St., S.W. - Room 2335  
Washington, DC 20590

Dear Mr. Felder:

Attached is a request from Columbia Gas (CG) for a waiver from the requirement of 49 CFR<sup>1</sup> 192.619(a)(2)(ii). The waiver is requested to allow CG to continue to operate portions of its natural gas distribution system at existing pressures.

In 1982, CG Uprated a section of gas pipeline in Hagerstown from an MAOP of 60 psig to an MAOP of 175 psig. As you know, pipelines that are Uprated must meet the same requirements as new pipelines. New pipelines are required to be pressure tested under 49 CFR Part 192.619(a)(2). CG does not have documentation of the pressure test required by 49 CFR Part 192.619(a)(2)(ii) for two segments of the Uprated pipeline and is requesting a waiver from this requirement.

The Commission and CG have investigated all possible methods of verifying that the pipelines were pressure tested to substantiate a 175 psig MAOP. CG has searched all records repositories. At the request of the Commission, CG also contacted present and former employees in an attempt to verify the pressure test of these pipeline segments. No adequate verification was found.

These segments of gas pipeline have an excellent maintenance history and have shown no signs of being a risk to public safety since the increase in MAOP in 1982. Approval of this waiver will establish an MAOP of 175 psig for the sections of pipeline described in CG's waiver request. In accordance with "Guidelines for States Participating in the Pipeline Safety Program", the Commission deems the notice, written comment, and hearing requirement as being unnecessary in this instance. The Maryland Public Service Commission will notify CG that the waiver is approved, effective sixty days from the date you receive this letter, unless you formally object within the sixty-day period.

If you have any questions concerning this action, please contact Alex Dankanich, Assistant Chief Engineer, Gas Pipeline Safety at (410) 767-8082.

Sincerely,  
H. Russell Frisby, Jr.  
Chairman

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<sup>1</sup>Code of Federal Regulations

May 19, 1997

Alex Dankanich  
Assistant Chief Engineer - Pipeline Safety  
Public Service Commission  
Engineering Division  
6 St. Paul Street  
Baltimore MD 21202-6806

Dear Mr. Dankanich:

Columbia Gas of Maryland, Inc. (CMD) owns and operates a distribution system in Hagerstown, MD consisting of approximately 37,618 feet of predominately 6" and 8" welded, cathodically protected steel pipe originally installed in 1968 and 1969. In 1982, this system was updated to a new MAOP of 175 psig from an MAOP of 60 psig in accordance with CMD procedures and Subpart K of Part 192 of the DOT Pipeline Safety Code. This system (#35017004) is CMD's Hagerstown west end high pressure supply system feeding the Hagerstown medium pressure (60 psig MAOP) distribution system.

We are now unable to locate the original installation work orders with the original test pressures for two sections of this system. We believe they were pulled from vital records during the update in 1982 and apparently never returned. A search for these records has been conducted in our general office vital records facility at Columbus, Ohio at the Area Office in Hagerstown, MD and at the Regional Office in York, PA. These two work orders involve 8908 feet of 8" and 6" pipe installed in 1969 and 1971 respectively. This amounts to only 23% of the total high pressure system. All other documentation for other pipe sections (77% of total HP supply line) has been located indicating original pressure tests from 273 psig to 550 psig during installation for all pipelines and related laterals installed before or after 1969. This includes documentation of the original test pressure of 320 psig on 6700 feet of 8 inch HP main that was installed in 1968 immediately upstream of the two sections in question.

This conforms with CMD's original intention in 1968 to operate this newly installed second feed steel coated and wrapped pipeline at 175 psig. A 60 psig MAOP was initially established for the 18,536 feet of 6" and 8" steel pipe from Regulator Station No. 3854 to the current Regulator No. 4004 since this new steel feed line was initially tied into the existing 60 psig medium pressure system without Regulator No. 4004. New regulation was installed (Regulator Station #4004) at the end of the steel pipeline segments in question in 1982 when the 175 psig update was performed. Records for the two sections of pipe with the missing work orders are available that confirm the 175 psig update pressure in 1982 on the 8908 feet of 8" and 6" pipe in question.

Review of entire system Cathodic Protection history from 1975 to 1996 including the two pipe sections indicate that all test stations have had acceptable readings of 0.85 or above. A review of leakage history from our 3 year leakage inspections shows no reported leaks on the two sections of pipe or on any other sections of the Hagerstown Western H.P. Supply Line. The entire 175 psig Hagerstown Western H.P. Supply System operates below 20% of SMYS and is defined as Distribution Main per the DOT Pipeline Safety Code and as such does not have a patrolling requirement.

Based upon the above information and the fact that the Hagerstown Western High Pressure System has been operating at the 175 psig since 1982 with no problems, Columbia Gas of Maryland, Inc. respectfully requests a waiver from the U.S. DOT Pipeline Safety Regulations Part 192.619(A)(2)(ii) requiring us to produce documentation of the original test pressure records for the following pipelines:

- ▶ 3655 feet of 8" steel and 2773 feet of 6" steel on Antietam and Walnut to the intersection of Summit and Memorial Blvd. beginning at Regulator Station No. 4286 and ending at Regulator Station No. 4003. This pipe was originally installed in 1969.
- ▶ 5408 feet of 6" steel on Memorial Blvd. from Summit to Cannon, beginning at Regulator Station No. 4003 and ending at Regulator Station #4004. This pipe section was originally installed in 1971.

Approval of this waiver would permit the continued operation of above described pipe sections of the

Hagerstown H.P. Pipeline System at 175 psig with an associated 175 psig M.A.O.P.

If you have any questions about this request, please contact either Alison Gebauer at 717/852-3331 or Don Williams at 717/852-3343.

Sincerely,  
Robert T. Burrows  
General Manager – Operations