



U.S. Department  
of Transportation

**Research and  
Special Programs  
Administration**

400 Seventh Street, S.W.  
Washington, D.C. 20590

JAN 28 2003

Douglas Kilpatrick, P.E.  
Pipeline Safety Director  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr., S. W.  
Olympia, Washington 98504-7250

Dear Mr. Kilpatrick:

We have considered your letter of December 19, 2002, notifying us that the Washington Utilities and Transportation Commission (WUTC) has granted the Avista Utilities Corporation (Avista) a waiver from compliance with 49 CFR 192.321(a).

The waiver will permit the installation of 6-inch nominal diameter, SDR 11.5, PE plastic carrier pipe into a 10 -inch nominal diameter steel casing on the underside of the Argonne Road Bridge over the Spokane River located in Spokane, Washington. Approximately 339 feet of the plastic piping will not meet the burial requirements of 192.321(a). The steel-encased plastic pipe will be protected against mechanical damage and ultraviolet radiation, and meet all stress limits applicable to plastic pipe. Avista has also agreed to additional requirements imposed by the Commission, as recommended by the WUTC Pipeline Safety Staff.

We have no objection to the waiver. The circumstances are comparable to those of previous waivers we have approved permitting the installation of plastic pipe above ground on bridges.

Sincerely,

for Stacey L. Gerard  
Associate Administrator  
for Pipeline Safety