

March 17, 2008

DOT Docket Management System: U.S. Department of Transportation  
Docket Operations, M-30  
West Building Ground Floor, Room W12-140  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Re: Polyamide-11 (PA-11) Plastic Pipe Design Pressures, Docket No. PHMSA–2005–21305;  
Notice 2

The Gas Piping Technology Committee (GPTC) consists of approximately 90 members with technical expertise in natural gas distribution, transmission, and gathering systems. Its membership is balanced between gas distribution operators, gas transmission operators, manufacturers, and general interest personnel including federal and state regulators.

The GPTC is an independent technical committee and has been an American National Standards Institute (ANSI) accredited committee since 1992 and has the designation of ANSI/GPTC Z380. The American Gas Association (AGA) has been the Secretariat to this Committee since 1990.

In 2005, the GPTC filed comments in support of the two petitions filed by Arkema to increase the design factor and to raise the design pressure limit for new resin Polyamide-11 pipelines. GPTC supports the proposed revisions to 49CFR 192.121 and 192.123 as presented in Notice 2 of the NPRM. The revisions would result in allowing all new 4-inch IPS or less, SDR-11, PA-11 pipelines to be designed using a design factor of 0.40 and would also raise the design pressure limit from 100 psig to 200 psig for the same pipelines.

The revised regulations would provide operators an alternative to installing metal pipe with the added benefits of reduced installation and maintenance costs as well as eliminating the threat of corrosion to the pipeline. Equally important is the historical evidence, as stated in the NPRM, that the new PA-11 pipelines can be operated at the higher pressure without compromising public safety.

The GPTC appreciates the opportunity to comment on the above-referenced Notice of Proposed Rulemaking.

Should you have any questions regarding these comments or about the GPTC in general, please do not hesitate to call me at 202-824-7312.

Sincerely,



Paul Cabot  
Secretary  
ASC GTPC/Z380