



February 25, 2016

SENT VIA EMAIL

Mr. Matt Smith
Interim Manager, Gas Pipeline Safety
Illinois Commerce Commission
527 E. Capitol Avenue
Springfield, Illinois 62701

Dear Matt:

This letter is in response to the Notice of Probable Violation (NOPV 2016-V001-00035 and 2016-V002-00035) issued on January 26, 2016, following Staff's Record Audit (Inspection # 2015-P-00423) of Ameren Illinois (AIC) at the Mattoon Operating Center on December 15, 17, and 18, 2015.

During the audit, Staff completed a review of pipeline patrol records which indicated plastic main installed in an above grade casing adjacent to a box culvert at two locations: 11th Street and Van Buren and 12th Street and Van Buren in Charleston. Staff observed these installations in the field and noted that plastic main cannot come above ground, even in a casing, unless it is attached to the underside of a bridge and is protected from heat and cold variations. Staff issued two instances of an NOPV, with reference to 49 CFR §192.321 which defines the requirements for plastic pipe installed on bridges in paragraph (h). This paragraph indicates that "plastic pipe may be installed on bridges provided that it is:

- (1) Installed with protection from mechanical damage, such as installation in a metallic casing.
- (2) Protected from ultraviolet radiation, and
- (3) Not allowed to exceed the pipe temperature limits specified in §192.123."

Staff noted that AIC must relocate the plastic mains below ground at these locations and must review records to determine if other similar installations exist, and if so, must identify when they will be modified to be in compliance with 192.321.

Staff requested that AIC submit evidence refuting the probable violations or if such evidence cannot be provided, a written plan outlining actions to be taken to correct the violation including a schedule and the date when compliance is anticipated and steps that AIC has taken or expects to take to prevent a recurrence, by February 25, 2016.

Since the audit, AIC reviewed the installations at these locations and determined the following information:

1. The plastic pipe inside of the steel casing at the 11th and Van Buren St. creek crossing is a 2" Aldyl-A plastic pipe. Based on the Hydrostatic Design Basis (HDB) for vintage Aldyl-A pipe, the maximum pressure rating for this pipe at 140°F, is calculated at 51.2 psig. The 2" plastic pipe operates below this limit, at a Maximum Allowable Operating Pressure (MAOP) of 20 psig.
2. The plastic pipe inside of the steel casing at the 12th and Van Buren St. creek crossing is a 3" Aldyl-A plastic pipe. Based on the Hydrostatic Design Basis (HDB) for vintage Aldyl-A pipe, the maximum pressure rating for this pipe at 140°F, is calculated at 48.8 psig. The 3" plastic pipe operates below this limit, at a Maximum Allowable Operating Pressure (MAOP) of 20 psig.

While AIC believes these installations meet the three requirements referenced in 192.321(h), the code does not specify how pipe must be installed in relation to a bridge, or if a similar structure, such as a box culvert meets the intent of this section.

For corrective action, AIC plans to relocate the plastic pipe below ground as requested by Staff, and retire the existing above grade pipe at both of these locations. The construction work orders are currently in engineering and will be completed once the winter heating season is completed, no later than June 30, 2016.

In addition to these locations, AIC has also reviewed the pipeline patrol records for facilities installed above ground, and has not identified any additional locations where plastic pipe is installed in a steel casing on a bridge.

Please feel free to contact me if you have any concerns or if you would like any additional information regarding this issue.

Sincerely,



John W. Bozarth
Manager, Gas Compliance & Training

cc: RDPate
EMKozak
SRColyer
BASheriff
GTJustice