



**November 7, 2024**

**Rosemary Chiavetta  
Secretary  
The Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
2<sup>nd</sup> Floor, Room-N201  
Harrisburg, PA 17120**

**Subject: Request for Special Permit Waiver for Odorization Exemption under 49 CFR 192.625 for Hydrogen Gas Pipeline**

Dear Secretary Chiavetta:

Matheson Tri-Gas, Inc. (Matheson) is writing to request a Special Permit Waiver for an exemption from the odorization requirements specified in 49 CFR 192.625, for its hydrogen gas distribution pipeline located in St Marys, Pennsylvania. Its Operator Identification Number (OPID) is 40697. We believe this pipeline segment qualifies for an exemption from 49 CFR 192.625 based on the following justifications:

**1. Pipeline Description and Operation:**

- The pipeline segment in question is a coated steel cathodically protected pipeline approximately 1.83 miles in length. The outside diameter is not greater than two inches, Grade X42 steel, in Class Location 2 and 3. The installation date was 1996. The average operating pressure is 85 psig or less.
- This pipeline is located at 203 West Creek Road, St Marys, PA 15857. The location is in Elk County, PA.

**2. Justification for Exemption:**

- **Safety Measures:** Matheson has implemented advanced safety measures that ensure the safe operation of the pipeline without the need for odorization. These measures include annual leak detection surveys. Matheson is only required to perform leak detection every five years as per the Pipeline and Hazardous Materials Safety Administration (PHMSA) regulations, because the pipeline is coated cathodically protected steel outside a business district. Additionally, Matheson proposes to increase the leak detection surveys to twice a year if the Special Permit Waiver is granted.



- **Technical Analysis:** The industrial customers the pipeline serves cannot have odorant in the hydrogen gas they receive. Furthermore, at this time, there is no commercially available odorant suitable for hydrogen gas in the United States. The odorants that are available precipitate out of hydrogen gas and pipelines too rapidly to function as effective odorants. Matheson Tri-Gas's hydrogen pipeline has been in operation since 1996 without a reportable incident or safety related condition. No leaks have been reported on the pipeline since Matheson has owned and operated the pipeline. The pipeline has no known corrosion indicators, and the Distribution Integrity Management Plan (DIMP) shows very low risk of failure.
  - **Environmental and Public Impact:** Matheson is not aware of any adverse environmental impacts that would be created by an exemption to 49 CFR 192.625. The DIMP indicates that the public's safety will not be adversely affected.
3. **Alternative Measures:**
- In lieu of odorization, Matheson proposes the following alternative measures to ensure safety and compliance: Two leak surveys per year.
4. **Public Involvement and Transparency:**
- Matheson is committed to maintaining transparency and involving the public in this process. Matheson conducts its Public Awareness Program to comply with all requirements of 49 CFR 192.616 and API RP 1162 to educate excavators, the public near the pipeline, local emergency responders, and public officials on pipeline safety and educate them on the hazards of hydrogen.
5. **Conclusion:**
- Based on the above justifications, we respectfully request that the Pennsylvania Public Utility Commission, and subsequently the Department of Transportation, Pipeline and Hazardous Materials Safety Administration, grant a Special Permit Waiver for the odorization exemption of the specified hydrogen gas pipeline segment. Matheson believes that the proposed alternative measures will provide an equal or greater level of safety compared to the current regulatory requirements.



**MATHESON**

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Thank you for considering our request. Matheson is available to provide any additional information or clarification as needed.

Sincerely,

**Rodney Snyder**

**Plant Manager**

**MATHESON**

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cc: Allison Kaster, Director and Chief Prosecutor  
Bureau of Investigation and Enforcement