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103 William Howard Taft Rd  
Cincinnati OH 45219

September 23, 2019

Public Utilities Commission of Ohio  
180 East Broad Street  
Columbus, Ohio 43215

**RE: Case # 19-0047-GA-ORD, Comments on proposed gas pipeline safety rules**

Dear Commissioners

The Miami Group of the Ohio Chapter of the Sierra Club (Cincinnati), would like to thank the Public Utilities Commission of Ohio (Commission) for the opportunity to comment on the proposed revisions of the Commission's Pipeline Safety Regulations in Chapter 4901:1-16 of the Ohio Administrative Code, Gas Pipeline Safety, Case No.:19-47-GA-ORD

We believe the current regulations, which appear to be limited to engineering and construction quality issues, do not adequately address human and environmental safety. We note that input is solicited directly from the oil and gas industry, but not from other stakeholders, such as safety experts from PHMSA, PIPA, etc., Fire Marshalls, First Responders, etc., or ordinary citizens and their elected officials. There is no mention of locality-specific risks arising in the immediate human environment.

Current regulations do not place significant emphasis on human safety in that the regulations do not address pipelines passing near homes, schools, hospitals, businesses, etc.; do not require emergency plans from the gas companies, nor do they require qualified engineers, managers, pipefitters, etc. Regulations do not address a requirement for automatic shutoff valves, mitigation plans for leaks into environmentally sensitive areas (streams, wetlands, and the like), and do not include human safety assessments. While PHMSA recommends pipelines not be placed closer than almost 700 feet from homes, and other populated structures, the OH regulations ignore this.

The Sierra Club in Cincinnati views the proceedings in the current case as flawed and unacceptable.

Thank you for your time and attention.

Sincerely,

Robert M. Park  
Miami Group Chair

Cc:  
Ohio Chapter of the Sierra Club  
Sally Dannemiller

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