

Proposed Conditions for Salisbury Bio Gas CPG

Background

The Salisbury Biogas project proposes to install and operate a biogas plant in Middlebury Vermont. The plant will use anaerobic digestion to generate methane gas from animal waste and food wastes. The output of the plant will be compressed to 220 psig, cleaned and dehydrated to match pipeline quality gas with regard to moisture content and trace gases (such as H₂S, CO₂, hydrocarbons, etc.). The output of the gas cleaning equipment will be pipeline quality gas at 220 psig and will be sold to Vermont Gas via a short pipe. VGS will install a metering and regulator station and then tie in to their normal distribution system.

Conditions for CPG

Because the output of the gas cleaning equipment will not be immediately taken over by VGS, Salisbury Biogas must include the following design and operating requirements in their installation for the pipe between the gas cleaning unit supplied by DMT and the M&R (Metering and Regulation) Station owned and operated by VGS.

If the pipe is considered transmission, the Department requires the following additional conditions:

1. The pipe shall operate meeting all transmission requirements per 49 CFR Part 192 for design, testing, operations and maintenance.
2. The pipe shall not operate at greater than 50% SMYS and shall be hydrostatically tested to at least 1.5 times the MAOP or at least 330 psi whichever is greater.
3. The pipe shall be considered as located in an HCA and must follow all of the additional requirements per 49 CFR 192 Subpart O.

If the pipe is considered high pressure distribution, the Department requires the following additional conditions:

1. All of the requirements per 49 CFR Part 192 for design, operations and maintenance of high pressure distribution per shall apply for design, testing, operations, and maintenance.
2. All of the requirements per 49 CFR Part 192 Subpart P for Distribution Integrity.

Regardless on the final determination of the pipe (transmission, high pressure distribution, or distribution) Salisbury is responsible for the testing, maintenance, and operation of the pipe including all subparts of 49 CFR Part 192 such as Subpart B, Materials. Subpart C, Pipe Design, Subpart D, Design of Pipeline Components, Subpart E, Welding of Steel in Pipelines, Subpart G, General Construction Requirements, Subpart I, Corrosion Control, Subpart J, Testing, Subpart L, Operations, Subpart M, Maintenance and Subpart N. Qualification of Pipeline Personnel. All of the applicable industry standards as referenced by US DOT PHMSA must also be followed using the edition or version as specified in 49 CFR Part 192.

Salisbury must also prepare and implement a quality control program for both the installation of the pipe and operation which must contain how they will monitor and control the quality of the pipe, which API standards (such as API Specification 5L level 2 per 49 CFR Part 192.112 (a)) will be used, how they will qualify the welders, how they will control and assure that the gas quality meets minimum standards for moisture, and other contaminants and prevents them from traveling down the pipe to the VGS M&R station. Two weeks before start of pipeline or main construction Salisbury must provide the Department with a copy of the quality manual for approval and two weeks before start up the quality control program for gas components must be provided to both the Department and VGS.

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