



J.R. Simplot Company  
Simplot Headquarters  
1099 W. Front Street  
Boise, Idaho 83702  
P.O. Box 27  
Boise, Idaho 83707

208 336 2110

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**SENT VIA UPS OVERNIGHT DELIVERY**

U.S. Department of Transportation  
Pipeline and Hazardous Materials Safety Administration  
East Building, 2nd Floor  
Mail Stop: E24-455  
1200 New Jersey Ave., SE  
Washington, DC 20590

Dear Sir or Madam:

Simplot Foods Group requests an interpretation of 49 CFR, Part 192.625 in regards to odorant testing of a naturally odorized biogas pipeline.

As background information, the pipeline facility in question transports biogas produced by an anaerobic digester to an industrial facility to be used as boiler fuel. The natural characteristics of this biogas give it a strong smell and contains hydrogen sulfide which is a toxic gas. The naturally produced odor and hydrogen sulfide is produced by the biologic action of the bacteria consuming the organic material within the digester and is not added to the gas stream as would a traditional odorant.

Additionally, 49 CFR, Part 192.625(f) requires the use of an instrument to determine odorant concentration. The traditional methods of determining odorant concentration uses an odorometer which subjects operating personnel to breathing the hydrogen sulfide which is toxic.

Specifically Simplot requests an interpretation of 49 CFR, Part 192.625(f) specifically if the gas contains a strong natural odor whose concentration cannot be changed due to the biologic process by which it is produced, and that gas contains a toxic constituent which precludes traditional concentration testing, can odorant concentration testing be waived in this situation.

Thank you for your prompt attention and response to this letter. Your interpretation and insight are greatly appreciated.

Sincerely,

A handwritten signature in blue ink, appearing to read 'A.L. Prouty', with a long horizontal flourish extending to the right.

Alan L. Prouty  
Vice President, Sustainability & Regulatory Affairs

cc: Tara Swanson, J.R. Simplot Company  
Burl Ackerman, J.R. Simplot Company  
Alicia Duke, J.R. Simplot Company