



U.S. Department
of Transportation

Pipeline and Hazardous Materials
Safety Administration

1200 New Jersey Avenue SE
Washington DC 20590

OCT 26 2016

Mr. Jonathan C. Wolfgram
Chief Engineer
Minnesota Department of Public Safety
445 Minnesota Street, Suite 147
Saint Paul, MN 55101-4145

Dear Mr. Wolfgram:

In a July 25, 2016, letter to the Pipeline and Hazardous Materials Safety Administration (PHMSA), you requested an interpretation of 49 CFR Part 192. You specifically requested an interpretation of § 192.739 for the regulatory requirements of inspection and testing of pressure limiting and regulating stations. You asked whether § 192.739 requires a test to physically operate ("pop") the relief device.

Yes, § 192.739 requires a test to physically operate the relief device. Section 192.739 requires inspection and testing of pressure limiting stations, relief devices (except rupture discs), and pressure regulating stations at intervals not exceeding 15 months, but at least once each calendar year. These devices must be inspected and tested to comply with § 192.739 using any practicable method that will demonstrate the presence or absence of the listed qualities. Physical operation and activation of a relief device are part of the inspection and testing. Tests must operationally activate the relief device, and demonstrate pressure control or relief at the correct pressure consistent with the pressure limits in order to comply with § 192.739. In addition, specific procedures should be documented in the operator's operating and maintenance plan prescribed by § 192.605. If we can be of further assistance, please contact Tewabe Asebe at 202-366-5523.

Sincerely,

Cameron H. Satterthwaite
Acting Director, Office of Standards
and Rulemaking



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Office of Pipeline Safety

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July 25, 2016

Mr. John Gale

Director of the Office of Standards & Rulemaking

Office of Pipeline Safety (PHP-30)

PHMSA, U.S. Department of Transportation

1200 New Jersey Ave. S.E.

Washington, D.C. 20590-0001

Mr. Gale,

I am contacting you in regards to an interpretation of the regulatory requirements for inspection and testing of pressure limiting and regulating stations noted in Title 49 Code of Federal Regulations §192.739. The regulatory requirements include inspections and tests at intervals not exceeding 15 months, but at least once each calendar year to determine pressure limiting devices (relief devices) are:

1. In good mechanical condition;
2. Adequate from the standpoint of capacity and reliability of operation for the service in which it is employed;
3. Except as provided in paragraph (b) of this section, set to control or relieve at the correct pressure consistent with the pressure limits of §192.201(a); and
4. Properly installed and protected from dirt, liquids, or other conditions that might prevent proper operation.

My question for you is, in addition to validating the set-point of the relief device or pilot, does §192.739 require a test to physically operate ("pop") the relief device?

I appreciate any clarification that you can provide in this manner.

Sincerely,

A handwritten signature in black ink, appearing to read "Jonathan C. Wolfgram". The signature is written over a horizontal line.

Jonathan C. Wolfgram, P.E.

Chief Engineer