

March 29, 1971

Mr. Paul M. Heim  
Assistant Vice President  
Heath Consultants Incorporated  
Zero Laurel Avenue  
Wellesley Hills, Massachusetts 02181

Dear Paul:

First, I would like to apologize for the delay in your not receiving a timely reply to your letters. Both letters were put together for reply and for some unknown reason the package was misplaced.

In reply to your letter of January 25, 1971, question 1, portable flame-ionization equipment does qualify as suitable equipment for performing a gas detector survey required by Section 192.723(b) of the gas pipeline safety regulations.

In response to questions 2 and 3 our interpretation is that it is not necessary to have a probe inserted into manholes or into cracks in pavements or sidewalks. It is necessary that your flame-ionization equipment pass over all such areas in such manner that the presence of gas leaking through cracks or the accumulation of gas within manholes would be detected.

I trust this information answers your questions, and if I can be of further assistance, please let me know. We'll try harder to be more responsive.

Sincerely,

/signed/

Joseph C. Caldwell  
Acting Director  
Office of Pipeline Safety