

Mr. Charles H. Garland, Chairman
Arizona Corporation Commission
1688 West Adams
Phoenix, AZ 85007

Dear Mr. Garland:

In your letter January 30, 1974, regarding Amendment 192-15, you express satisfaction with our extension of the requirement for odorization of gas in transmission lines until January 1, 1975, and recommend that it be extended until January 1, 1985. In this regard, you mention that the distribution operators in Arizona are dependent upon an interstate transmission company for odorization because the operators do not have their own odorization equipment.

Apparently you are interpreting Amendment 192-15 to apply in Arizona. This amendment only applies to odorization of gas in transmission lines in those States which required such odorization on August 12, 1968. We believe that Arizona is not one of those States.

The amendment has limited application because it merely continues in effect the interim Federal safety standards in 49 CFR, Part 190 applicable to odorization of gas in transmission lines. In accordance with the Natural Gas Pipeline Safety Act of 1968, State gas standards which were in effect on August 12, 1968, were adopted as interim Federal standards. Where a State required odorization of gas in transmission lines, the requirement became an interim Federal standard. If a State had no requirement for odorization of gas in transmission lines, then an interim Federal standard for such odorization was not established in that State.

Notwithstanding the present lack of a Federal requirement for odorization of gas in transmission lines in Arizona, El Paso Natural Gas, which is undoubtedly the interstate transmission company to which you refer, has been odorizing gas in its transmission lines for years. This company's odorization has enabled the Arizona distribution operators that it serves to comply with the Federal requirement in 49 CFR 192.625 for odorization of gas in mains and service lines. If El Paso were to cease odorization, any operator that it supplies that is without independent means for odorization would be open to violation of that requirement.

The situation in Arizona would change, however, if a final rule is adopted as proposed in Docket No. OPS-24, 38 F>R> 22044 on August 15, 1973. This proceeding was commenced to invite public comment on a proposal to require odorization of gas in certain transmission lines, applicable nationwide, in lieu of the limited requirement presently in effect. The proceeding should be completed this year.

I hope my comments on this matter are helpful to you in interpreting the Federal Gas pipeline safety standards.

Sincerely,

/signed/

Joseph C. Caldwell
Director
Office of Pipeline Safety

Mr. C. L. Greenwalt
Manager, Gas Department
Central Illinois Public Service Company
607 East Adams
Springfield, Illinois 62701

Dear Mr. Greenwalt:

Your letter of January 11, 1972, addressed to the Secretary of the Hazardous Materials Regulations Boards has been forwarded to me for reply.

In your letter, you inquire:

"As we interpret the different government regulations, the testing of the relief valves on our LPG storage tanks is covered by NFPA Standard No.59 as referenced in Paragraph 192.11 of Part 192 in Title 49 of the Federal Regulations. Paragraph 62 of NFPA Standard No.59 recognizes the 5 year test period for relief valves on LPG storage tanks. Please advise if our interpretation is incorrect."

Your interpretation is correct. The notice to which you refer, Notice 71-27; Docket No. RM-6D, is a Notice of Proposed Rule Making involving Section 195.428. This section is contained in Part 195 titled "Transportation of Liquids by Pipeline" (49 CFR Part 195). Pipeline carriers who transport liquid hazardous materials and petroleum in interstate and foreign commerce are subject to the regulations in Part 195. Operators of natural gas pipeline facilities are subject to the regulations in Part 192 (49 CFR Part 192).

Please contact me if I can be of any more assistance in this matter.

Sincerely,

/signed/

Joseph C. Caldwell
Acting Director
Office of Pipeline Safety