

February 13, 1973

Mr. Thomas Mitchell
Iowa Public Service Company
P.O. Box 778
Sioux City, Iowa 51101

Dear Mr. Mitchell:

This is in response to your telephone conversation with Mr. Cesar DeLeon of this office on January 10, 1973, in which you ask us to verify by letter that §192.619(b) and §192.621(b) of Title 49 of the Code of Federal Regulations provide for installation of overpressure protective devices for gas systems that have a maximum operating pressure determined by the corrosion history of the pipe segment. You indicated in your telephone conversation with Mr. DeLeon that it appeared to you that these two sections were in conflict with §192.195 and §192.197 which do not apply to installation of overpressure protective devices on systems built prior to March 12, 1971, or systems which were replaced, relocated, or otherwise changed prior to November 12, 1970, pursuant to §192.13, 49 CFR.

The requirements of §192.195 and §192.197 are contained in Subpart D of Part 192 which prescribes minimum requirements for the design and installation of pipeline components and facilities. Sections 192.619 and 192.621, on the other hand, are operational requirements contained in Subpart L. Section 192.603(a) makes clear that no person may operate a segment of pipeline unless it is operated in accordance with the requirements of Subpart L. Subpart L sets forth the continuing requirements necessary to insure safe operation of a pipeline independent of the initial design, installation and construction requirements that were applicable to that pipeline. Sections 192.619(b) and 192.621(b) prescribe requirements for the operation of pipeline facilities regardless of when these pipelines were installed. Therefore, you must comply with the requirements of both of these sections in the operation of your gas facilities.

We trust that this has answered your particular question. If we can be of further service regarding this matter, please let us know.

Sincerely,

Joseph C. Caldwell
Director
Office of Pipeline Safety