

March 18, 1974

Mr. Robert Tibbs, Business Agent  
Oil, Chemical & Atomic Workers Local 5-6  
Mr. Eugene Roedder, Business Manager  
Electrical Workers Local 1439  
2200 - 59th Street  
St. Louis, MO 63110

Dear Messrs. Tibbs and Roedder:

This responds to your letter of February 22, 1974, regarding the installation of plastic gas main, electric cables, and telephone facilities in the same trench.

The Federal standards governing installation of a gas main are set forth in 49 CFR Part 192. Subparts G of the standards contain various construction requirements written, for the most part, in performance terms. Problems of installation in a common trench are covered in Subpart G and in §192.467 with respect to corrosion control. The standards do not specifically prohibit the type of installation you describe, but it must meet all applicable requirements in Part 192.

The Missouri Public Service Commission is responsible for enforcing the Federal standards as to intrastate pipeline facilities in Missouri operated by public utilities other than a municipality. If you have information that Federal requirements are being violated, it should be reported to the Commission in the case of a privately owned utility, or to us in the case of a municipality. The Occupational Safety and Health Administration of the Department of Labor may also have regulations for the safety of employees at the installation.

If we may be of further assistance in this matter, please let us know.

Sincerely,

Joseph C. Caldwell  
Director  
Office of Pipeline Safety