

PI-74-0129

August 2, 1974

Mr. L. D. Hanawalt
The Shafer Valve Company
2500 Park Avenue
Mansfield, OH 44906

Dear Mr. Hanawalt:

In response to your letter of July 10, 1974, requesting an interpretation of Part 192 and Part 195 of Title 49 of the Code of Federal Regulations concerning the requirements for valve operator mechanisms, we wish to point out:

1. In Part 192 Subpart B – Materials – Section 192.53 General materials for pipe and components and Subpart D – Design of Pipeline Components – Section 192.143 General requirements, would apply to pipeline components. In addition, there are requirements that valves and operating devices must be readily accessible and protected from tampering and damage in section 192.179 Transmission line valves.
2. Part 195 contains the following material requirements that would be applicable to valve operators if the conditions described fit the operating methods of the device: Section 195.116 Valves (b) materials subject to the internal pressure of the pipeline system, including welded and flanged ends, must be compatible with the pipe or fittings to which the valve is attached. (c) Each part of the valve that will be in contact with the commodity stream must be made of materials that are compatible with each commodity that it is anticipated will flow through the pipeline system.

The Office of Pipeline Safety (OPS) does not approve or endorse any proprietary item, but holds the pipeline operator responsible for compliance with the regulations.

We hope that this provides a better understanding of the applicability of the DOT requirements. Thank you for your interest in pipeline safety.

Sincerely,
SIGNED
Joseph C. Caldwell
Director
Office of Pipeline Safety

The Shafer Valve Company
2500 Park Avenue
Mansfield, OH 44906

July 10, 1974

Mr. Joseph C. Caldwell
Director, Office of Pipeline Safety TES - 30
Department of Transportation
Washington, D. C 20590

RE: REQUEST FOR INTERPRETATION OF DOT SPECIFICATIONS

Dear Sir:

This company is the manufacturer of automatic hydraulic valve operators and controls used in the opening and closing of pipeline valves in natural gas and liquid (petroleum and petro-chemical) transmission lines.

Several of our customers presently have asked us for certifications that our equipment complies with DOT specifications. We have reviewed carefully the regulations published in the Federal Register for Title 49, Transportation, Part 192 for Natural Gas Pipeline Systems and Part 195 for Liquid Pipeline Systems. We experience difficulty in locating sections of this Title reading upon our equipment which will permit us to determine whether or not we can give our customers a compliance certification. We ask that you review the enclosed material which describe our products and if you, as we already have, conclude that neither Parts 192 or 195 sets forth specifications to which we can or must conform, please give us a letter saying so which we can then relate to our customers.

Should you have any questions at all relating to this request and information about the equipment, please let us know.

Thank you very much.

Yours very truly,
ER VALVE COMPANY
L.D. Hanawalt