

PI-74-0156

December 27, 1974

H. R. Garabrant, P.E.
Gas Utilities Safety Engineer
Arizona Corporation Commission
1688 West Adams
Phoenix, AZ 85007

Dear Mr. Garabrant:

Thank you for your letter of December 9, 1974, suggesting that an enclosed line marking sign currently used by the Southwest Gas Corporation be permissible under the line marking requirements being considered by this office for distribution lines.

Line marking requirements for distribution lines were proposed by notice in the Federal Register on May 25, 1972 (copy enclosed). We expect to issue a final rule on the subject as soon as the Technical Pipeline Safety Standards Committee prepares its report on the technical feasibility, reasonableness, and practicability of the proposed rule.

The sign appears to meet the proposed requirements in all respects except that it reads "Warning Gas Line" rather than "Warning Gas Pipeline" as proposed. If the proposed wording is adopted, the company may wish to apply for a waiver to sanction the use of the sign after the new rule is effective.

Sincerely,
Joseph C. Caldwell
Director
Office of Pipeline Safety

Arizona Corporation Commission
1688 West Adams
Phoenix, Arizona 85007

December 9, 1974

Mr. Joseph C. Caldwell
Office of Pipeline Safety
Department of Transportation
Washington, D.C. 20550

Dear Mr. Caldwell:

At the recent seminar held in Arizona, I learned from Jim Thomas that the Office of Pipeline Safety was considering the desirability of pipeline markers for certain distribution lines.

I would appreciate it when a description of the marker is defined that it does not rule out a marker such as I have enclosed.

This marker, although not shown as a standard in many of the mail order sign company catalogues which provide signs mostly in compliance with OSHA's standards, is actually better for certain uses in my opinion than some of the "Danger Gas Line" signs that they offer which may be good for other purposes.

Some of the reasons whereby I think the enclosed sign is more desirable for the prevention of third party damage are as follows:

1. The sign specifically gives instructions what to do if digging is contemplated.
2. The sign gives the telephone number and name of the company owning the line.
3. The shape of the sign is less vulnerable to damage by bending due to its shape.
4. The sign does not seem to be as attractive a target for rifle or pistol fire as a white square or larger horizontal rectangular sign. (In this State vandalism of signs by rifle fire is still an expensive maintenance problem)
5. Sign is low cost and easily installed on a metal sign post.

Although the company utilizing this sign does not have transmission lines in this State by DOT standards, they have been marking their distribution lines in vulnerable locations with this sign - The procedure and sign which, as State Gas Utility Safety Engineer, I endorse as a good safety measure.

Sincerely,
ARIZONA CORPORATION COMMISSION
H. R. Garabrant, P.E.
Gas Utilities Safety Engineer