

PI-76-0107

July 15, 1976

Mr. E. S. Hanson
Senior Vice President
Cities Service Gas Company
First national Center
Oklahoma City, Oklahoma 73102

Dear Mr. Hansom

In your letter of May 14, 1976, to Mr. Marshall W. Taylor, II, Chief, Central Region, you ask whether 49 CFR 192.707(c) requires line markers at regulator stations.

Section 192.707 (c) provides:

“Pipelines Aboveground. Line markers must be placed and maintained along each section of a main and transmission line that is located aboveground in an area accessible to the public.”

Since under section 192.3 a “regular station” is included within the meaning of the terms “transmission line” and “main,” any aboveground regulator station must be marked if it is located in an area accessible to the public. For the purpose of section 192.707(c), an area is accessible to the public if entrance into the area is not physically controlled by the operator or if the area may be entered without difficulty.

With regard to your question about marking a farm tap meter and regulator installation, a farm tap which serves a single customer is classified as a “service Line” under 49 CFR part 192 and would therefore not be subject to the marking requirement of section 192.707(c). Where a farm tap serves more than one customer, a portion of it would be classified as either a “main” or “transmission line” and subject to the marking requirement if located above ground.

We trust this satisfactorily responds to your inquiry.

Sincerely,
Cesar DeLeon
Acting Director
Office of Pipeline
Safety Operations

United States Government
Department of Transportation
Materials Transportation Bureau

June 10, 1976

To: Chief, Regulations Division, MTP-30
Thru: Chief, Operations Division, MTP-50

FROM: Chief, Central Region

SUBJECT: Request for interpretation

Cities Service Gas Company has requested an interpretation pertaining to marker requirements for aboveground pipelines in their information letter of May 14, 1976. The request is contained in item 3 of the letter.

Clarification is requested for 192.707(c) Pipelines aboveground, which states that "Line markers must be placed and maintained along each section of a main and transmission line that is located aboveground in an area accessible to the public."

We respectfully submit for consideration aspects of this requirement which have been discussed with operators in the course of our inspections. This discussion is included to indicate the positions we have taken in the past.

1. Marking of metering and regulating stations.

We have contended that metering and regulating stations are required to be marked to meet the aboveground piping marking requirement. We also contend that valve settings require markers for identification. We do consider, however, that if a road crossing marker is located in the near vicinity of such aboveground facilities, an additional marker is not required.

2. Accessibility to the public.

The question of what is accessible to the public has also been discussed. Some feel that the presence of a fence around the piping, at a regulating station for instance, renders the piping inaccessible to the public, and negates the marker requirement. The regulation states, however, that if the pipe is in an area accessible to the public it must be marked. It does not refer to the accessibility of the piping alone. The area in which the piping is located should not be construed to mean that small space often enclosed by the operator's fence.

We have also recommended that markers be located at aboveground piping such as spans, in remote areas. Remote areas are not necessarily inaccessible to the public.

3. Farm taps.

Cities Service has suggested that requiring markers at metering and regulating stations might also require marking of farm tap piping facilities. This office has not recommended the marking of farm tap facilities. Farm tap piping would not fall under the classification of a main or transmission line.

We would appreciate it if the items aforementioned could be included - in your interpretation for Cities Service. If they cannot, since the operator's request does not specifically confront these situations, please advise us as to the validity of our assumptions to enable us to maintain uniformity in our compliance program throughout the five regions.

Marshall W. Taylor, II, MTF -50-CE

Cities service Gas Company
First National Center
Oklahoma City, OK 73102

May 14, 1976

Mr. Marshall W. Taylor, II
Chief, Central Region
Office of Pipeline Safety Operations
911 Walnut Street
Kansas City, Missouri 64106

Dear Mr. Taylor:

Pursuant to your request in letter dated April 16, 1976, for compliance information with Title 49 of the Code of Federal Regulations, Part 192, following is Cities Service Gas Company's status of records, inspection, and policy,

1. Testing of Relief Devices on the Air System at Saginaw Compressor Station.

It is Cities' policy to test relief valves installed on its compressor station air systems annually. The fact that the air system relief valves at Saginaw were not tested was an oversight. Such inspection and testing have been completed and a copy of inspection record is attached.

2. Testing of Relief Devices at Regulator Stations

Instructions issued by Cities to its responsible field personnel stated that relief devices must be tested annually. These instructions were interpreted by some employees to mean once each calendar year. Accordingly, test records indicated appropriate tests in 1974 and 1975 but the time interval exceeded one year. Revised Instructions are being prepared stating "relief devices must be tested at intervals not exceeding twelve months."

3. Marking of Transmission Pipelines

Specific instructions are being prepared emphasizing that all transmission line spans should be marked. These instructions will be issued to all pipeline divisions to supplement current instructions. The seven spans mentioned in the inspection report have been marked.

In regard to identifying signs at regulator stations, Cities does not interpret § 192.707 to require pipeline markers at every above ground appurtenance. The marker regulation was amended specifically to prevent damage to buried transmission lines and mains by excavation-related activities. Nearly four pages of discussion and comments were issued in conjunction with the revised marker regulation dated April 12, 1975. These comments center on protecting buried, unseen transmission lines and mains with the exception of § 192.707(c), which refers to above ground transmission lines and mains. For these reasons we do not feel that § 192.707 was intended to require identifying signs at regulator stations. We,, therefore, respectfully request an official interpretation of the regulation.

In formulating such interpretation, consideration should be given to the overall ramifications of carrying out a marker or identification program encompassing all appurtenances. For example would a farm tap meter and regulator installation require marking or identification?

4. Transmission Valve Inspections

During 1972 and 1973, a number of supervisory personnel changes occurred at our Miami, Oklahoma pipeline division. Apparently, due to lack of continuity of supervisory responsible

personnel, Cities' policy of inspecting transmission valves was not carried out during this period; therefore, we cannot verify such inspections. From 1974 to date, documentation records show the program has been carried out in full compliance with the regulations.

5. Atmospheric Corrosion Monitoring of Above Ground Piping

Attached is the form we developed to monitor atmospheric corrosion, together with instructions pertaining to its use. Such data was issued to meet compliance and documentation requirements of § 192.481. It appears that field supervisors generally misinterpreted these instructions to apply only to above ground pipelines such as spans or transmission lines mounted on bridges. Your inspection report has called to our attention that more explicit instructions need to be prepared and issued with respect to monitoring of atmospheric corrosion. These instructions are now being prepared.

6. Calculation of Relief Valve Capacities

When Cities adopted its program to comply with § 192.743, it was felt that appropriate documentation of relief device capacities should be maintained in the Oklahoma City office where such calculations are conducted. With this concept, field personnel only test set pressures of relieving devices. For example calculation of capacity of relief valves installed on the Stones Corner TBS and Silvercreek Addition TBS are attached for your review.

It is intended that the foregoing provides all of the information requested in your letter of April 16, 1976. Cities Service Gas Company is vitally interested in carrying out safe operations of its pipeline system and is endeavoring to comply with all applicable DOT regulations. We appreciate the concern and courtesy extended to our field personnel by your compliance inspector; moreover, we are fully cognizant of the joint effort required of industry and government to carry out safe pipeline operations and wish to assure you of our full cooperation.

Yours very truly,
E. S. Hanson, Senior Vice President
Gas Transmission Division