

August 24, 1992

**INFORMATION:** Part 195 Jurisdiction

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Your memo of June 16, 1992, asks if Part 195 applies to two pipelines. The first one, an 8-inch collection line that operates at less than 20% SMYS, transports stove oil from a Unocal facility in Portland to a nearby Santa Fe pipeline, which runs between Portland and Eugene. The second, a 12-inch delivery line that operates at less than 20% SMYS, transports gasoline from an Olympic pipeline, which runs between Washington State and Portland, to a Unocal facility in Portland.

Part 195 applies to pipelines used in the transportation of hazardous liquids. However, ?195.1(b)(3) exempts transportation of a hazardous liquid through pipelines that operate at a stress level of 20 percent or less of SMYS. Because Part 195 applies to entire pipeline systems, in applying this exemption, we consider an entire pipeline system that operates at 20 percent or less of SMYS is exempt.

Neither pipeline you asked about is a unique system. Each one is merely a part of a larger system, serving either to introduce products into the system or take products from it. Therefore, each pipeline is subject to Part 195. Ownership of the pipelines is not a relevant jurisdictional consideration.

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