



U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, D.C. 20590

JUN 11 2012

Mr. Richard Abraham
Regulatory Compliance
Marathon Pipe Line LLC
539 South Main Street
Findlay, OH 45840-3295

Dear Mr. Abraham:

In a letter to the Pipeline and Hazardous Materials Safety Administration (PHMSA) dated October 21, 2011, you ask whether the 49 CFR 192.221(b) exceptions for welding of steel in pipelines apply to Part 195.

You also state that "Subpart E-Welding of Steel in Pipelines" under § 192.221(b) appears to be quite specific in its message, because you believe that this Subpart does not apply to welding that occurs during the manufacture of steel pipe or pipeline components. Therefore, you read this subpart to mean that girth welding, for example, performed in a manufacturing setting to assemble pipe, fittings, flanges, and a closure as part of a skid-mounted pig launcher not to adhere to Part 192 welding requirements.

PHMSA disagrees with your determination that skid mounted pig launcher assemblies do not fall under the welding requirements of Part 192. The exception in § 192.221(b) is referring to the manufacture of pipe and pipeline components. Manufactured pipeline components are individual elbows, tees, valves, flanges, and fabricated fittings. Fabricated assemblies such as a meter skid, compressor skid, pig launcher/receiver skid units, or spools of pipe fall under the § 192.3 definition of "Pipeline" and are not manufactured pipeline components. Fabricated assemblies are defined as the joining together of fittings, valves, flanges and other fabricated components. Fabricated assemblies must be constructed in accordance with Part 192 requirements.

PHMSA acknowledges that there are differences between Parts 192 and 195 welding of steel in pipeline requirements. Because they are independent standards, the Part 192 requirements and exceptions do not apply to Part 195. In this case, the question is moot because the welding requirements of Part 195 apply to constructing new pipeline systems with steel pipe, and for relocating, replacing, or otherwise changing existing pipeline systems. Therefore, the Part 195 requirements do not apply to welding that occurs in the manufacture of pipe or individual pipeline components. However, using these individual components to construct them into pig launchers, etc., does constitute an "assembly" and is subject to Part 195 regulations. I hope that this information is helpful to you. If I can be of further assistance, please contact me at 202-366-0434.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. A. Gale', written over a white background.

John A. Gale
Director, Office of Standards
and Rulemaking



Marathon Pipe Line LLC

539 South Main Street
Findlay, OH 45840-3295
Telephone 419/421-3529

October 21, 2011

OCT 31 2011

Office of Pipeline Safety (PHP-30), PHMSA
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590-0001

Subject: Request for Interpretation

To Whom It May Concern:

As an operator of both liquid and gas pipelines subject to 49 CFR Parts 195 and 192, we occasionally notice inconsistencies between these two regulations that are not seemingly related to the transported products. One such difference, for which we request your interpretation, involves welding in the manufacture of steel pipeline components.

“Subpart E—Welding of Steel in Pipelines” under Part 192, §192.221(b) appears to be quite specific in its message:

“This subpart does not apply to welding that occurs during the manufacture of steel pipe or pipeline components.”

We read this to mean, for example, that girth welding performed in a manufacturing setting to assemble pipe, fittings, flanges, and a closure as part of a skid-mounted pig launcher does not have to adhere to Part 192 welding requirements.

Part 195, on the other hand, does not include a distinct subpart dedicated to *welding* but rather, its welding-related references are located under “Subpart D—Construction.” Within that subpart, there is no regulation language that parallels §192.221(b). In fact, after reviewing the remaining subparts of Part 195, we can find no other section that appears to except welded steel components from this Part’s welding requirements.

If our understanding of §192.221(b), as described above, is correct, and it is agreed that Part 195 does not have a similar exception, is it your opinion that we can apply the Part 192 exception to Part 195?

Sincerely yours,

Richard Abraham
Regulatory Compliance
419-421-2290