



U.S. Department of Transportation
**Pipeline and Hazardous Materials
Safety Administration**

1200 New Jersey Ave, S.E.
Washington, D.C. 20590

DEC 20 2012

Ms. Michelle Denault
Regulatory Compliance Manager
Interstate Storage and Pipe Line Corporation
400 Amherst Street, Suite 405
Nashua, NH 03063

Dear Ms. Denault:

In a letter to the Pipeline and Hazardous Materials Safety Administration (PHMSA) dated August 1, 2012, the Interstate Storage and Pipe Line Corporation (ISPC) requested an interpretation of the applicability of the Federal pipeline safety regulations at 49 CFR Part 195 Subpart E. Specifically, ISPC requested a determination on whether a certain alternative test method can be utilized to satisfy the Part 195 pressure testing requirements for a buried pipeline.

Under Part 195 requirements, a pipeline that is not visually inspected for leakage during a pressure test must undergo an eight hour pressure test. ISPC proposed an alternative approach developed by Hansa Consult of North America involving a 45-minute test followed by a stress test that places the pipeline at 125 percent of maximum operating pressure for a two-to-four hour period. ISPC stated that the proposed technique would determine tightness or lack of leaks in the pipeline to an accuracy of 0.002 percent of line test segment volume and would minimize stresses on the pipeline and thus the growth of defects.

The alternative approach to pressure testing you have described does not meet the requirements of 49 CFR Part 195, Subpart E for pressure testing pipeline. Should you elect to do so, you may apply for a special permit that, if granted, would waive or modify the existing requirement under controlled conditions. The special permit application process is outlined in 49 CFR 190.341(b) - *How do I apply for a special permit?*

I hope that this information is helpful to you. If I can be of further assistance, please contact me at 202-366-4046.

Sincerely,

John A. Gate
Director of Standards
and Rulemaking
Office of Pipeline Safety

The Pipeline and Hazardous Materials Safety Administration, Office of Pipeline Safety provides written clarifications of the Regulations (49 CFR Parts 190-199) in the form of interpretation letters. These letters reflect the agency's current application of the regulations to the specific facts presented by the person requesting the clarification. Interpretations do not create legally-enforceable rights or obligations and are provided to help the public understand how to comply with the regulations.



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Mr. John Gale
Director of Standards & Rulemaking
Pipeline and Hazard Materials Safety Administration
Department of Transportation

August 1, 2012

Dear Mr. Gale,

Interstate Storage & Pipeline Corporation (ISPC) recently had a meeting with PHMSA's Eastern Region to discuss our DOT pressure test, which is required under our Integrity Management Plan to be performed every five years. In particular, we discussed alternative technologies available to meet this requirement. Mr. Byron Coy of PHMSA recommended that we contact your office in order to seek an interpretation of 49 CFR 195 Subpart E.

New technologies have become common practice in compliance with CFR 280.44 Subpart D on EPA regulated pipelines to determine both the tightness of the line and the ability of the line to withstand stresses without putting the line under the unnecessary stress of an 8 hour pressure test.

In Kiefner's article "Study Questions Specified Hydrotest Hold Time's Value" in the March 5, 2012 edition of Oil & Gas Journal, it states that "The effect of hold time at maximum test pressure is to cause defects to grow and perhaps cause those defects to fail that would otherwise have required higher pressures to fail under straight pressurization. Holding at the maximum test pressure level causes defects that grow substantially to fail and also causes a portion of the remaining family of defects to extend". It is our desire to minimize the stress on the pipeline and thus the extension of theoretical defects if at all possible. Hansa Consult of North America (HCNA) is a well established, US EPA Third Party Certified pipeline tightness testing company. It has proposed to us a technique which would determine tightness or lack of leaks in the pipeline to an accuracy within 0.002% of line test segment volume. This test occurs over a 45 minute period and does not require extended periods of higher than normal pressure along the line. The second part of their technique involves a stress test which places the pipeline at 125% of maximum operating pressure for a two to four hour period. Due to the tightness of the



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line having already been determined, this test is looking at the ability of the line to withstand pressure rather than the presence of leaks.

It is our desire to test our lines utilizing the HCNA two-pronged approach, with the stress portion of the test at a pressure of 125% of MAOP for 4 hours with no further stressing of the line. It is our belief that this approach meets or exceeds the intent of the CFR, is consistent with PHMSA's Mission to protect people and the environment from the risks inherent in transportation of hazardous materials and the Agency's Goals of Safety and Environmental Stewardship by reducing unnecessary stress on the pipeline in question.

Our request for interpretation is to determine if there is a technical reason that this technology approach cannot be utilized to satisfy the CFR requirement for our lines.

We understand that the process for this interpretation might take more time than we have before we are required to complete our testing, however, if it is possible to obtain the interpretation by October 1, 2012 it would allow us to move forward with this new technology and less invasive testing process. If not, we understand that a request of this nature requires a process to be followed, and will look to utilize this procedure if still the best alternative, at a later time.

We presented the technical details and certifications of the HCNA approach to the PHMSA DOT Eastern Region office, and would be happy to share this information with you at your convenience.

Thank you,



Michelle Denault
Regulatory Compliance Manager