

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

April 17, 2026

PHMSA Pipeline Safety Team,

I am writing on behalf of an operator of a liquid pipeline to request PHMSA's guidance regarding the applicability of **49 CFR Part 195** to a particular liquid pipeline system. Specifically, I am seeking clarification as to whether a liquid product stream meets the definition of a Hazardous Liquid specified in 49 CFR §195.2, which is as follows:

- *Hazardous liquid* means **petroleum, petroleum products**, anhydrous ammonia, and ethanol or other non-petroleum fuel, including biofuel, which is flammable, toxic, or would be harmful to the environment if released in significant quantities.
 - **Petroleum** means crude oil, condensate, natural gasoline, natural gas liquids, and liquefied petroleum gas.
 - **Petroleum product** means flammable, toxic, or corrosive products obtained from distilling and processing of crude oil, unfinished oils, natural gas liquids, blend stocks and other miscellaneous hydrocarbon compounds.

The pipeline in question is a four-mile, 4" OD line that begins in a measuring station on the upstream side at an above-ground manual valve. The pipeline then goes underground as it exits the measuring station. It travels under a federal highway in a horizontal directional drill section and ultimately comes back above ground as it enters a terminal/storage station and ends at a manual valve on the downstream side.

The pipeline transports a liquid product stream which is generally described by the operator as "Spent Sulfidic Caustic Stream" to a storage tank at the terminal. The fluid stream primarily consists of water and sodium hydroxide. However, an analysis of the stream composition indicates the presence of hydrocarbons as well, most notably 2.91% benzene by weight; additional details are provided in the table below.

Although the intended function of the pipeline is to transport sodium hydroxide, §195.2 suggests that the fluid stream includes petroleum products; since no minimum concentration threshold is specified, this also suggests that the pipeline would be considered as transporting a hazardous liquid.

1. Is there a minimum threshold of petroleum and/or petroleum product that must be present in a pipeline for it to be considered as transporting a hazardous liquid?
2. Does the primary function of a pipeline affect the applicability of §195.2? **Specifically, would the pipeline described above fall under PHMSA jurisdiction even though its main purpose is to transport sodium hydroxide rather than petroleum products?**

The table below shows the representative composition of the transported fluid by weight percentage. Please let us know if any additional information is needed to make this assessment. We appreciate PHMSA's guidance on this matter.

Compound	Output: Combined Stream Composition (wt%)
1,3 - Butadiene	0.08%
3-Methylbutene	0.25%
Benzene	2.91%
Cis 1.3 Pentadiene	0.25%
Cyclopentene	0.50%
Cyclopentadiene	0.25%
Dicyclopentadiene	0.75%
Hydrocarbons, C6	0.05%
Isoprene	0.05%
Light Thermal Cracked Distillate	2.05%
Steam Cracked Residuum (Petroleum)	0.45%
Styrene	0.50%
Toluene	1.30%
Naphtha (petroleum), light steam-cracked	0.60%
Sodium Hydroxide	3.75%
Water	88.00%

I look forward to your response.

Thank you,

Tom Olaseinde

Snr. Project Engineer | O: 346.437.9874. C: 361.355.0659. | tom.olaseinde@altamira-us.com

[10370 Richmond Avenue, Suite 800](#)

Houston, TX 77042

