



Schoonover Executive Solutions, LLC

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Pipeline Standards and Rulemaking Division
Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration
U.S. Department of Transportation
1200 New Jersey Avenue, SE
Washington, DC 20590

Over the past several years, the use of portable gas supply systems (PGSS) has increased in the pipeline industry. These systems provide critical continuity, flexibility, and cost savings during pipeline outages, remote operations, and emergencies. They offer reliable supply of gas while repairs, both planned and unplanned, are undertaken. For example, PGSS are commonly used by local distribution companies to provide undisrupted gas supply while changing out regulators. The systems can also be used to provide gas distribution to areas where service is not yet established and to promote recovery during emergencies.

PGSS are typically comprised of trailers equipped with racks of composite cylinders supplying gas at pressures as high as 6527 psig (450 bar), depending on the cylinder specifics and the type of gas transported. For compressed natural gas (methane) the supply pressures generally are 3600 psig (250 bar) but regulated down to supply service pressures as low as 4 psig. PGSS trailers can provide portable gas storage and delivery capacity of 52,000 or greater standard cubic feet of gas.

Generally, these systems are manufactured to comply with the Hazardous Materials Regulations (49 CFR Parts 100-185). However, the increased acceptance of these systems coupled with the growing supply industry and limited regulatory standards has resulted in startup companies relying on their experience from other sectors, such as the automotive industry, when deciding on the components used in these systems. In one system that is presently in use in the United States, the trailer supply system is equipped with Blackstone SAN 209 regulators designed and tested under ECE R110 for vehicle use. Additionally, some of these systems are not equipped with an over-pressurization protection system. As a result, we are seeking interpretation of the regulations under 49 Code of Federal Regulations Part 192 related to the regulator systems on PGSS. We look forward to your guidance of the following questions:

Question 1: What certification standards apply to regulator and control systems equipped on these trailers? Are ECE R110, ISO 15500-9, or CSA NGV 3.1-1995 acceptable compliance standards for these devices if connected to a pipeline or local distribution system? Are other, non-vehicle standards appropriate?

Question 2: Who is responsible for ensuring compliance? What information should a supplier provide to a pipeline operator or local distribution company to demonstrate compliance with Part 192?

Question 3: On a portable gas supply systems with a maximum operating pressure potential of 3600 psig, is the system compliant with 49 CFR 192.197(c) when the only regulator is a Blackstone SAN 209 (or similar step-down regulator) and no additional protection is provided by the PGSS? If, yes, are there additional requirements for operators when connecting a PGSS to their system?

Thank you for your time regarding this matter. If you need addition information, please don't hesitate to contact me at william.s.schoonover@gmail.com.

Sincerely,



William S. Schoonover