U.S. Department
of Transportation

Pipeline and Hazardous Materials
Safety Administration

1200 New Jersey Avenue SE
Washington DC 20590

JUL 3 1 2018

Mr. Wallace R. Jones
Director, Gas Pipeline Safety
Alabama Public Service Commission
P.O. Box 304260
Montgomery, AL 36130

Dear Mr. Jones:

In an October 17, 2017, letter to the Pipeline and Hazardous Materials Safety Administration (PHMSA), you requested an interpretation of 49 CFR Part 192. Specifically, you requested an interpretation regarding the abandonment or deactivation of a service line in § 192.727(d).

You provided the following information.

> After reviewing previous written interpretations on the PHMSA website and on WinDOT, questions have been brought forth regarding proper enforcement of this section; if an operator disconnects the piping (such as removing the meter) and also incorporates a locking or sealing device (options (1) and/or (2)), must both ends of the pipe be sealed? Since the language in the rule states that "*one of the following must be complied with*" would the operator be fulfilling the obligations of this section if option (1) or (2) is adhered to, and the meter is removed but both ends of the pipe are not sealed?

Also, you referenced the following:

> The following was found on WinDOT as interpretation 192.727 12:
>
> January 29, 1985
> Talked to Mel Judah on 727 removal off meters and he agrees that when meter is pulled that both ends must be sealed even though valve may be locked.
>
> 1/29/85
> NOTE: Need to write for interpretation to incorporate in file.

As you noted, there is no formal interpretation referencing the above "NOTE" in WinDOT or on the official PHMSA website, and the January 29, 1985 note did not contain an interpretation. Therefore, you requested an interpretation of the § 192.727(d) requirements.

Section 192.727(d) states (emphasis added):

(d) Whenever service to a customer is discontinued, *one of the following* must be complied with:

(1) The valve that is closed to prevent the flow of gas to the customer must be provided with a locking device or other means designed to prevent the opening of the valve by persons other than those authorized by the operator.

(2) A mechanical device or fitting that will prevent the flow of gas must be installed in the service line or in the meter assembly.

(3) The customer's piping must be physically disconnected from the gas supply and the open pipe ends sealed.

Based on the language of § 192.727(d), an operator can use any of the three methods to deactivate a service line from a customer line connection. If an operator closes and locks a valve to prevent the flow of gas in accordance with § 192.727(d)(1), the operator is not also required to physically disconnect the pipe from the gas supply under § 192.727(d)(3). If, however, the operator does not close and lock a valve preventing the flow of gas to the customer, the operator must physically disconnect the customer's piping and seal the open ends or install a mechanical device or fitting that will prevent the flow of gas. An operator may use more than one method, but must fully comply with at least one of the methods that it chooses. An operator is expected to perform any deactivation activities in a manner that ensures the safety of the pipeline and that complies with its operations and maintenance procedures under § 192.605.

As to your second question whether both ends of the service pipe need to be sealed after the meter is removed, if the operator incorporates a locking or sealing device, this is considered physically disconnecting the piping and, therefore, the open ends must be sealed if the operator intends to comply with § 192.727(d)(3). As noted above, if the operator complies with § 192.727(d)(1), the operator is not also required to comply with § 192.727(d)(3). Please be advised that when physically disconnecting pipe, sealing both ends (service line and customer line) of the pipe protects against leaks or unintentional opening of any isolation valves from the service line. It also keeps both the service and customer lines from getting moisture and debris in the pipe that could hinder the safety of future gas deliver service to the customer.

If we can be of further assistance, please contact Tewabe Asebe at 202-366-5523.

Sincerely,

John A. Gale
Director, Office of Standards
and Rulemaking

STATE OF ALABAMA
PUBLIC SERVICE COMMISSION
P.O. BOX 304260
MONTGOMERY, ALABAMA 36130

OCT 23 2017

October 17, 2017

Via Certified Mail, Return Receipt Requested

Mr. John A. Gale, Director
Office of Standards and Rulemaking (PHP-30)
PHMSA, U.S. Department of Transportation
1200 New Jersey Avenue SE
Washington, DC 20590-0001

RE: Formal Interpretation of 49 CFR Part 192, §192.727(d)

Dear Mr. Gale:

This is a request for a formal interpretation of 49 CFR Part 192, §192.727(d) which states:

(d) Whenever service to a customer is discontinued, one of the following must be complied with:

(1) The valve that is closed to prevent the flow of gas to the customer must be provided with a locking device or other means designed to prevent the opening of the valve by persons other than those authorized by the operator.

(2) A mechanical device or fitting that will prevent the flow of gas must be installed in the service line or in the meter assembly.

(3) The customer's piping must be physically disconnected from the gas supply and the open pipe ends sealed.

After reviewing previous written interpretations on the PHMSA website and on WinDOT, questions have been brought forth regarding proper enforcement of this section; if an operator disconnects the piping (such as removing the meter) and also incorporates a locking or sealing device (options (1) and/or (2)), must both ends of the pipe be sealed? Since the language in the rule states that "*one of the following must be complied with*" would the operator be fulfilling the obligations of this section if option (1) or (2) is adhered to, and the meter is removed but both ends of the pipe are not sealed?

The following was found on WinDOT as interpretation 192.727 12:

January 29, 1985

Talked to Mel Judah on 727 removal off meters and he agrees that when meter is pulled that both ends must be sealed even though valve may be locked.

1/29/85

NOTE: Need to write for interpretation to incorporate in file.

There is no formal interpretation referencing this note in WinDOT or on the official PHMSA website. Therefore, this office is now requesting a formal written interpretation for enforcement of this specific section of the code.

Sincerely,

Wallace R. Jones

Wallace R. Jones, Director
Gas Pipeline Safety