



U.S. Department  
of Transportation

Pipeline and Hazardous Materials  
Safety Administration

1200 New Jersey Avenue SE  
Washington DC 20590

SEP 24 2018

Mr. Karl H. Baker  
Public Utilities Supervisor of Technical Analysis  
Connecticut Public Utilities  
Regulatory Authority  
10 Franklin Square  
New Britain, CT 06051

Dear Mr. Baker:

In a January 12, 2018, letter to the Pipeline and Hazardous Materials Safety Administration (PHMSA), you requested an interpretation of 49 CFR Part 192. Specifically, you requested an interpretation of the odorization requirement for combustible gas in a distribution line under § 192.625.

You stated that you need clarification on the odorant testing requirements for operators of liquefied petroleum gas pipeline distribution systems (LPGPDS). You stated that PHMSA's recent interpretation of § 192.625(f) states operators must conduct periodic sampling of combustible gases using an instrument, but you noted neither § 192.625 nor the interpretation letter define where the testing must take place. Therefore, you asked the following questions:

**Question 1:** Is it permissible for an operator of a LPGPDS to only perform the required periodic instrumented sampling at the bulk plant, as defined in NFPA 58 – 2004 edition, Section 3.3.10, that supplies the LPGPDS or must the sampling occur at each specific LPGPDS?

**Question 2:** If it is permissible to only sample at the bulk plant, is there a LPGPDS size at which this is no longer permissible? For example, would this only apply to a small LPG Operator as defined by 49 CFR 192.1001?

PHMSA's responses to your questions are as follows:

**Response 1:** For safe transportation of gas by pipeline on distribution and some transmission lines, odorization is required under § 192.625. The odorant must be of a concentration that the gas, at one-fifth of the lower explosive limit, is readily detectable by a person with a normal sense of smell. To assure the proper concentration of odorant in the gas pipeline, under § 192.625(f), each operator must conduct periodic sampling of combustible gases using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable. Therefore, the required periodic

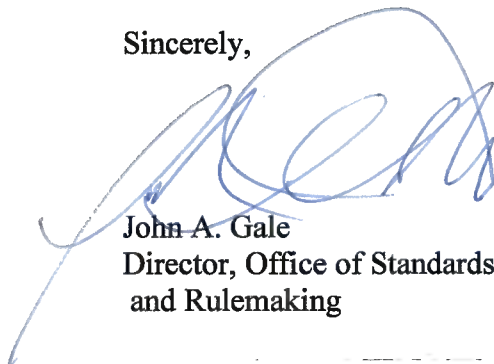
The Pipeline and Hazardous Materials Safety Administration, Office of Pipeline Safety provides written clarifications of the Regulations (49 CFR Parts 190-199) in the form of interpretation letters. These letters reflect the agency's current application of the regulations to the specific facts presented 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.

instrumental sampling, in this case, cannot be limited to testing at the bulk plant, but must be performed in the pipeline system to ensure the entire pipeline system has the required odorant levels.

**Response 2:** Based on PHMSA's response to question 1, the response to this question is moot, since the bulk plant is not a pipeline facility and is not regulated under the Federal pipeline safety regulations. Therefore, the required periodic instrumental sampling, in this case, is not limited to testing at the bulk plant, but must also be performed in the pipeline system to insure gas odorant is present up to the consumption of the gas.

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 CONNECTICUT**  
**PUBLIC UTILITIES REGULATORY AUTHORITY**

January 12, 2018

Mr. John Gale  
Director, Standards and Rulemaking Division  
Office of Pipeline Safety (PHP-30)  
Pipeline and Hazardous Materials Safety Administration  
U.S. Department of Transportation  
1200 New Jersey Avenue SE  
Washington, DC. 20590

Dear Mr. Gale,

The Gas Pipeline Safety Unit (GPSU) of the State of Connecticut Public Utilities Regulatory Authority seeks clarification on the odorant testing requirements for operators of liquefied petroleum gas pipeline distribution systems (LPGPDS). Your interpretation letter dated December 4, 2017, sent to Mr. David Hedrick of AmeriGas Propane, LP, clearly states that under 49 CFR 192.625(f), LPGPDS operators must conduct periodic sampling of combustible gases using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable. However, neither 49 CFR 192.625 nor this interpretation letter clearly define where this testing must take place.

Therefore, the GPSU requests answers to the following questions:

1. Is it permissible for an operator of a LPGPDS to only perform the required periodic instrumented sampling at the bulk plant, as defined in NFPA 58 – 2004 edition, Section 3.3.10, that supplies the LPGPDS or must the sampling occur at each specific LPGPDS?
2. If it is permissible to only sample at the bulk plant, is there a LPGPDS size at which this is no longer permissible? For example, would this only apply to a small LPG Operator as defined by 49 CFR 192.1001?

Thank you for your consideration in this matter. Please do not hesitate to contact me at 860-827-2661 or by email at [karl.baker@ct.gov](mailto:karl.baker@ct.gov) if there are any questions or if you require any additional information.

Sincerely,

Karl H. Baker  
Public Utilities Supervisor of Technical Analysis

JAN 23 2018