Sep 14 1976

Chief, Southern Region, MTP-50 SO

Acting Director, Office of
Pipeline Safety Operations, MTP-1

Interpretation of §192.5(d)(2)

You have asked whether a pipeline within 100 yards of a fairgrounds which is occupied by more than 20 persons a day for only a 6-day period annually would be in a Class 3 location under §192.5(d)(2). A similar question is asked with regard to a tractor-pull area which is occupied by more than 20 persons a day for only a 3-day period annually.

Further, you have asked whether a pipeline within 122 feet of a church which is occupied on Sundays and Tuesdays by less than 20 persons each day but has a daily attendance of more than 20 persons during an annual one week revival would be in a Class 3 location.

Under §192.5(d)(2), a Class 3 location is defined as:

> "An area where a pipeline lies within 100 yards of any of the following:
>
> (i)   A building that is occupied by 20 or more persons during normal use.
>
> (ii)   A small, well-defined outside area that is occupied by 20 or more persons during normal use, such as a playground, recreation area, outdoor theater, or other place of public assembly."

The purpose of this Class location definition is to require higher standards of safety for pipelines near buildings or small outside areas where 20 or more persons congregate at regular intervals. However, the examples of outside areas which are covered by the definition, i.e., playground, recreation area, outdoor theater, indicate that the definition is intended to apply to places where 20 or more persons assemble more frequently than one week annually. Also, the risk involved where an assembly of 20 or more persons meets annually for a short period would be much lower than where an assembly occurs more often, and thus does not necessitate application of the higher Class 3 safety standards.

Therefore, usage of the fairgrounds, tractor-pull area, or church in the way you have described would not cause a pipeline within 100 yards thereof to be in a Class 3 location under §192.5(d)(2)

Cesar DeLeon