

PI-76-0117

November 29, 1976

Mr. Carl J. Stokes
27312 Eaglehelm
Canyon Country, California 91351

Dear Mr. Stokes:

This responds to your letter dated October 15, 1976, and attached advertisement showing a type of meter riser manufactured by R.W. Lyall and Company, Inc. You have questioned the Office of Pipeline Safety Operations (OPSO), "do you consider that this design of riser would meet the Federal standard and that I would be in compliance with the code in using it?"

OPSO does not endorse or certify proprietary items. It is the responsibility of the operator to assure that gas facilities are constructed out of materials that will maintain their structural integrity under the anticipated temperature and environmental conditions to which they are exposed and be compatible with any gas that is transported. We are enclosing a copy of 49 CFR Part 192 for your information and use to determine if the meter risers would meet the applicable standards.

In addition to other applicable requirements, the meter risers must meet the requirements of 49 CFR §192.375(a) for protection of plastic service lines and §192.123, Design limitations for plastic pipe. With regard to the metal gas carrier, a determination must be made as to whether or not gas is transported through it as a carrier pipe below ground. If in fact gas is transported through the metal gas carrier below ground, then it must comply with the requirement of Subpart I for corrosion control.

Thank you for your interest in pipeline safety.

Sincerely,
Original signed by
Frank E. Fulton
Cesar DeLeon
Office of Pipeline
Safety Operations

Carl J. Stokes
27312 Eaglehelm
Canyon Country, Ca 91351

October 15, 1976

Mr. Jack C. Overly
Chief Western Regional Division
Office Pipeline Safety Operations
831 Mitten Road
Burlingame, Ca 94010

Dear Mr. Overly:

I am planning on the construction of a mobile home trailer park. In designing the utility 'hook ups" plastic pipe is to be used for the gas service. It is my understanding that a metal riser must come above ground from the plastic pipe and if it is steel must be cathodically protected according to the Federal Standard 192.455.

Attached is an advertisement by R. W. Lyle Co. on a steel metal riser which they claim does not need cathodic protection. In light of the Federal Standard I question the validity of their claim. On installation they specify that the riser be installed so the point of transition of plastic to steel be at the ground surface. The claim apparently is being that there is no steel in the ground carrying gas and no plastic above ground carrying gas. From a practical standpoint this is an impossible condition to permanently obtain since in time the soil surface level is either going to be raised or lowered by ground planting and cultivation by the customer. It is at this transition point where the steel would be the most susceptible to corrosion due to moisture, aeration of the soil and the use of fertilizers. This is also the location where gas leakage would be the most hazardous.

I also understand that this type of riser is being used by the Southern California Gas Company in Los Angeles.

My question is - do you consider that this design of riser would meet the Federal Standard and that I would be in compliance with the code in using it?

An answer would be appreciated as soon as possible.

Sincerely,
Carl J. Stokes

Carl J. Stokes
27312 Eaglehelm
Canyon Country, Ca 91351

December 8, 1976

Mr. Jack C. Overly, Chief
Western Region
Office of Pipeline Safety Operations
831 Mitten Road
Burlingame, Ca 94010

Dear Mr. Overly:

In your letter to me of October 26, 1976 you wrote you had forwarded my letter concerning the R. W. Lyle riser to your headquarters for an official interpretation.

To this date I have had no reply. I would appreciate anything you can do to expedite the matter.

Thanking you, I am

Sincerely,
Carl J. Stokes

Continental Industries, Inc.
4102 South 74th East Avenue
P.O. Box 994
Tulsa, Oklahoma 74101

Mr. Cesar Deleon
Acting Director,
Office of Pipeline Safety Operations
Washington, D. C. 20590

Dear Mr. Deleon:

I am enclosing a sketch of two types of meter risers we are proposing to manufacture for the gas distribution industry.

The thought behind this style of meter riser is to allow the gas distribution industry the option of purchasing a product which would comply with the D. O. T. Regulations prohibiting bringing thermoplastic above ground level where the temperature could exceed 100° F. and still fulfill the requirements of the corrosion section of the D. O. T. Regulations.

The basic principle of this type of meter riser is that the junction of the plastic to metal transition inside the shield pipe is made as shown in Detail "A" on the sketch. Above ground the metal insert becomes a gas carrying member with a plastic shield to above ground portion.

Our question is (a) will a riser of this type comply with D. O. T. Regulation for limiting the thermoplastic to 100° F and (b) would the metal gas carrier above ground inside the thermoplastic shield require cathodic protection?

Metal insert would be made of non-ferrous metal, mild steel, or stainless steel.

We thank you in advance for your early reply on these questions.

Respectfully,
E. W. Morain, P. E.
Manager, Plastic Division