

PI-77-0100

January 7, 1977

Mr. Philip F. Ashler
State Treasurer
State Fire Marshal
Tallahassee, Florida 32304

Your letter of October 4, 1976, to Webster B. Todd, Jr., Chairman, National Transportation Safety Board, indicated that the Bureau of LP Gas does not consider LP gas containers jurisdictional under 49 CFR Part 192.

A recent interpretation of the term "system" in connection with the regulation of petroleum gas systems under 49 CFR 192.11, published in the October issue of the OPSO Advisory Bulletin (copy enclosed), includes tanks storing petroleum gas in liquid form as being part of a petroleum gas system regulated by 49 CFR 192.11

We trust this interpretation clarifies any misunderstanding of the scope of jurisdiction of Part 192 over LP gas containers. Mr. Todd is also being advised of the interpretation.

Sincerely,
SIGNED
Cesar DeLeon
Acting Director
Office of Pipeline
Safety Operations

Philip F. Ashler
Treasurer of Florida
Tallahassee 32304

October 4, 1976

Mr. Webster B. Todd, Jr.
Chairman
National Transportation Safety Board
Washington, D.C. 20594

My dear Mr. Todd:

Your letter of September 21, 1976, regarding the matter of LP gas containers connected to OPS jurisdictional systems has been reviewed by Mr. Earl Kicliter, LP Gas Bureau Chief. Mr. Mater does recall a conversation with Mr. Charles Batten of the Office of Pipeline Safety regarding such matter; however, Mr. Kicliter does not recall having stated the LP gas containers were jurisdictional by the provisions of Title 49, Part 192, and in fact, Mr. Kicliter pointed out that the federal regulations do not address the subject of LP gas storage containers except by reference to NFPA Pamphlet 56.

Mr. Kicliter reminds me the Bureau of LP Gas has, since its inception in 1957, had the jurisdictional responsibility for a gas containers and the NITA Pamphlet 56 is the adopted code for this area of LP gas container safety.

This office does not consider the LP gas containers jurisdictional under Title 49, Part 192, and / hope this will help clarify any misunderstand.

With kindest personal regards.

Sincerely,
Philip P. Ashler
State Treasurer
State Fire Marshal

Relates to 49 CFR, Part 195, Subpart D

NOTICES UPDATE DEVELOPMENTS ON TRANS-ALASKA WELD PETITIONS AND ANNOUNCE PUBLIC HEARING... On October 6, 1976, the Office of Pipeline Safety Operations (OPSO) issued Notice 4-in Docket No. 76-12W (41 Fed. Reg. 44207, October 7, 1976), advising that additional technical information had been placed in the Docket which included a preliminary report on the National Bureau of Standards (NBS) analysis and assessment of (i) fracture mechanics as that analytical technique may be applicable for determining the effect of defects in girth welds on the structural integrity of the Trans-Alaska pipeline system and the alternative maximum allowable weld defect sizes proposed by Alyeska Pipeline Service Company, (ii) weld defect and arc burns sizes submitted by Alyeska in support of its petition for exemptions from certain welding requirements of 49 CFR Part 195 for individual welds in the main line pipe of the Trans-Alaska pipeline system, and (iii) methodologies for measuring the depth of those defects and arc burns. The Notice also advised that the Docket has been reopened to receive additional written comments until the close of business on October 28, 1976, and that the Deputy Secretary of Transportation will conduct a public hearing on this matter commencing at 8:30 a.m., Thursday, October 28, 1976, in the third floor auditorium of Federal Building 10A at 800 Independence Avenue, S.W., Washington, D.C.

The informal hearing on October 28 will be for the purpose of receiving the views of interested persons as to (1) whether a fracture mechanics analysis can properly serve as an alternative to the standards set forth in Subpart D of 49 CFR Part 195 for determining the integrity of girth welds in the main line of the Trans-Alaska crude oil pipeline system and (2) if so, whether the docketed technical information provides a valid basis for applying a fracture mechanics analysis to the particular girth welds for which Alyeska seeks waivers of the 49 CFR standard. Public participants will be permitted a maximum of 15 minutes for each presentation. Written copies of presentations are requested but not required. Persons desiring to make presentations at the hearing should write to or telephone the Docket Clerk (Ms. Peggy Hammond), Office of Pipeline Safety Operations (Alyeska Docket No. 76-12W), 2100 Second Street, S.W., Washington, D.C. 20590 (telephone 202-426-0135) to be received not later than noon, Tuesday, October 26, 1976, giving the following information: (1) Name; (2) Address; (3) Phone number during normal working hours; (4) Capacity in which presentation will be made (e.g., private citizen, public interest group, or public official); (5) Position--pro or con on each of the two issues stated above; and (6) Time (maximum 15 minutes) desired for presentation.

On October 21, 1976, Notice 5 in Docket No. 76-12W was published in the Federal Register announcing the receipt and inclusion in the Docket of the final report on the NBS analysis and assessment.

TAYLOR TO HEAD DOT ONSITE ALASKA MONITORING TEAM... Marshall W. Taylor, II, Chief of the Office of Pipeline Safety Operations' Central Regional Office, will head the Department's onsite monitoring team along the Trans-Alaska pipeline. Deputy Secretary of Transportation John W. Barnum announced recently. The team was sent to Alaska in July to monitor all aspects of the construction of the pipeline for the remainder of the 1976 construction season to assure that the pipeline is constructed in accordance with DOT regulations.

The five-member monitoring team is composed of two U.S. Coast Guard radiographic specialists and three DOT OPSO compliance inspectors. A third U.S. Coast Guard radiographic specialist will be assigned if necessary to provide additional capability to evaluate the adequacy of the radiographic records of the pipeline girth welds made in the field during the 1975 construction season. The team is also charged with the task of assessing the adequacy of the Alyeska Pipeline Service Company's remedial program to repair all welds that have been identified as having defects in excess of the DOT standards.

MTB DIRECTOR ADDRESSES GAS ASSOCIATION ANNUAL MEETING... On October 11, 1976, James T. Curtis, Jr., Director, Materials Transportation Bureau (MTB), discussed current Federal pipeline safety activities and their relationship to future gas industry goals before the annual meeting of the American Gas Association in Los Angeles, California. The Bureau Director summarized the first year of development of the MTB and activities of OPSO. Also discussed were the recent amendments to the Federal gas pipeline safety standards; regulatory activities relating to importation of liquefied natural gas; Arctic gas pipeline technology and specialized safety regulations; offshore pipeline safety amendments to

the regulations; DOT and State sponsored gas pipeline safety training courses and seminars; and some thoughts about probable future MTB and OPSO programs.

Relates to 49 CFR, §192.455

MTB PROPOSES TO AMEND GAS PIPELINE SAFETY STANDARDS RELATING TO CORROSION CONTROL FOR SMALL METAL FITTINGS IN PLASTIC PIPELINES...On September 22, 1976, the OPSO Acting Director issued Notice 76-1, Docket No. OPSO-37, in which the MTB proposes to amend the external corrosion control requirements of 49 CFR Section 192.455 with regard to alloy metallic fittings that are part of plastic pipelines. Under the existing Section 192.455, any metallic fitting which is part of a plastic pipeline must be coated and cathodically protected in accordance with applicable requirements unless the operator of the pipeline can demonstrate by certain tests, investigation, or experience in the area of application that a corrosive environment does not exist, or for a temporary installation of five years or less, that corrosion of the fitting will not be detrimental to public safety. However, when an installation intended to last more than five years is made without cathodic protection, the operator is required to make electrical tests within six months after the installation to adequately evaluate the fitting and apply cathodic protection if a corrosive condition is found. Thereafter, Section 192.465 requires that if a metallic fitting in a plastic pipeline is not protected under Section 192.455, it must be reevaluated every three years by electrical tests or other allowable methods and cathodically protected where active corrosion is found.

In a petition for rulemaking (Docket No. Pet. 74-15), the fitting supplier argues that the application of cathodic protection to short fittings with metallic parts made of Type 316 stainless steel is not necessary for safety when the fittings are in an otherwise all plastic pipeline and provided data in support of its position. In light of technical information made available, MTB is proposing that Section 192.455 be amended to allow the installation of small, electrically isolated alloy fittings in plastic pipelines without coating and cathodic protection if (1) an operator can show by tests, investigation, or experience in the area of application, that corrosion control is provided by alloyage, and (2) the fitting is designed to prevent leakage caused by localized corrosion pitting.

Interested persons are invited to participate in this rulemaking action by submitting such written data, views, or arguments as they may desire. Communications should identify the regulatory docket and notice numbers and be submitted in triplicate to the Director, Office of Pipeline Safety Operations, Department of Transportation, 2100 Second Street, S.W., Washington, D.C. 20590. All communications received by November 1, 1976, will be considered before final action is taken on the notice. Late filed comments will be considered so far as practicable. All comments will be available for examination by interested persons at the Office of Pipeline Safety Operations before and after the closing date for comments. Reprints of the notice (41 Fed. Reg. 42221, September 27, 1976) have been sent to those on the appropriate OPSO mailing lists.

Relates to 49 CFR, §192.313 and §195.212

MTB PROPOSES TO AMEND GAS AND LIQUID PIPELINE SAFETY STANDARDS CONCERNING BENDING PIPE HAVING LONGITUDINAL SEAMS...On October 18, 1976, the OPSO Acting Director issued Notice 76-2, Docket No. OPSO-38, in which the MTB proposes to amend Section 192.313(a)(4) of the Federal gas pipeline safety standards and Section 195.212(b)(3) of the Federal liquid pipeline safety standards to except bends made with an internal bending mandrel from the requirement that for field bends of steel pipe containing a longitudinal weld, the weld must be as near as practicable to the neutral axis of the bend. The notice is based, in part, on a petition dated October 18, 1975, by the Alyeska Pipeline Service Company (Pet. 76-11W) requesting that the pipe bending requirement of 49 CFR 195.212(e) (now §195.212(b)(3)) be repealed and, in the interim, that Alyeska be granted a waiver from compliance with the requirement with respect to the Trans-Alaska crude oil pipeline.

Interested persons are invited to participate in this rulemaking action by submitting such written data, views, or arguments as they may desire. Communications should identify the regulatory docket and notice numbers and be submitted in triplicate to the Director, Office of Pipeline Safety Operations, Department of Transportation, 2100 Second Street, S.W., Washington, D.C. 20590. All communications received by November 8, 1976, will be considered before final action is taken on the notice. Late filed comments will be considered so far as practicable. Reprints of the notice

(41 Fed. Reg. 46463, October 21, 1976) are being sent to those on the appropriate OPSO mailing lists.

Relates to 49 CFR, §195.218

RIVER CROSSING WAIVER GRANTED TO TRANS-ALASKA PIPELINE...On September 1, 1976, the MTB granted a waiver to Alyeska from compliance with the to welding requirement of 49 CFR 195.218 with respect to girth weld No. 49344T at the completed Jim River Crossing No. 2 on the Trans-Alaska crude oil pipeline. The girth weld serves to tie in two sections of 48-inch concrete coated pipe in the 620-foot crossing. Section 195.218 requires that longitudinal weld seams on adjacent lengths of pipe must be offset. However, at weld No. 49344T, the seams on adjacent pipe lengths are abutting, not "offset" as required. MTB reviewed the information and arguments submitted by Alyeska in connection with its petition and found that the requested waiver is not inconsistent with pipeline safety and is in the public interest. The reasons cited for this decision are quality of girth weld; ductility of the pipe and girth weld metals which would provide for localized yielding where high residual stresses may exist; mechanical properties of the girth weld and pipe metals minimize the likelihood of any concentration of residual stresses existing at the intersection of welds and surrounding heat-affected zone; longitudinal seams are ground flush with the inside pipe circumference at the joint mitigating the likelihood of any concentration of residual stresses caused by excess metal at the intersection of welds; and replacing weld No. 49344T to comply with Section 195.218 could reduce the pipeline's integrity because of the difficulties in cutting out a segment of the concrete coated crossing and rotating and realigning it in the river crossing. Accordingly, effective September 1, 1976, Alyeska was granted a waiver from compliance with 49 CFR 195.218 with respect to weld No. 49344T at the Jim River Crossing No. 2 on the Trans-Alaska crude oil pipeline (41 Fed. Reg. 38202, September 9, 1976).

IOWA COMMISSION SEEKS UTILITY REGULATION ENGINEER...The Iowa State Commerce Commission has an immediate opening for a Utility Regulation Engineer III in its gas safety and service program. Minimum requirements for the position are a B.S. degree in engineering; four years experience in the area of gas utility regulation with a State or .Federal regulatory agency; and possession of a certificate of registration as a Professional Engineer issued by the State of Iowa, or equivalent. Salary range is \$17,524 to \$24,648. Resumes and inquiries should be directed to Dean A. Briley, Executive Secretary, Iowa State Commerce Commission, 300 - 4th Street, Des Moines, Iowa 50319, telephone (515) 281-5256.

UTILITY LOCATION AND COORDINATION WORKSHOPS SCHEDULED FOR NEW YORK AND FLORIDA...The American Public Works Association (APWA) announces that its next series of Utility Location and Coordination Council (ULCC) workshops are scheduled to be held in New York City on November 16 and 17, 1976, at the Sheraton Inn, LaGuardia Airport, and on November 18 and 19, 1976, in Orlando, Florida, at the Sheraton Olympic Villas. Topics for the workshops include need for coordination, the national ULCC program, how to form a new committee, standardized field markings, standardized damage reports, developing utility location standards, computer assisted mapping and records, permit and record systems, one-call excavation notification systems, and related topics. Fees for the workshops for APWA members (and others qualifying) are \$85; nonmembers, \$100. For further information and registration, contact C. Richard Kuykendall, American Public Works Association, 1313 East 60th Street, Chicago, Illinois 60637, telephone (312) 947-2523.

SOUTHERN STATE AGENCY PIPELINE SAFETY LEADERS MEET...Gas pipeline safety liaison representatives from State agencies in OPSO's Southern Region held their second annual 2-day meeting in Atlanta, Georgia, on October 5-7, 1976. Representatives of all eight States in the Southern OPSO Region attended the Federal/State coordination sessions. Safety regulatory topics discussed in the meeting included LNG facilities, corrosion control, the Federal grant program, streamlining of Federal report forms, and an update on Federal regulations and technical studies. The new Southern Regional Chairman is Lamar Cockrell of the Florida Public Service Commission, and the Vice-chairman is James Stites of the South Carolina Public Service Commission. The 1977 Southern Region Federal/State meeting is tentatively scheduled for October in the Tampa, Florida, area.

NTSB REPORTS ON MICHIGAN-WISCONSIN COMPRESSOR STATION FIRE...On June 23, 1976, the National Transportation Safety Board (NTSB) issued two safety recommendation letters on its investigation of a natural gas incident which occurred near Cedardale, Oklahoma, on January 7, 1976. As work was nearing completion on the addition of compressor facilities, employees at the Michigan-Wisconsin Pipe Line Company's Cedardale, Oklahoma, compressor

station were directed to open a valve on a shut-in 12-inch gas-gathering pipeline in an attempt to increase the flow into the main line. Natural gas and natural gas liquids at 700-psig pressure passed through the valve, out through the end of an open 12-inch pipe, and into a ditch, where seven men were working near an open flame heater. The natural gas liquids saturated their clothing, and the flame from the heater set them on fire. "Five men were killed and two men were burned seriously as a result of this accident.

The NTSB recommended that Michigan-Wisconsin Pipe Line Company, operator of the system, initiate immediate action to conduct periodic training programs on the importance of following written procedures covering such situations; examine procedures for valve and piping changes to assure that each critical action is checked appropriately; and prohibit such changes, except in emergencies, while construction is conducted nearby. The NTSB also recommended that the Interstate Natural Gas Association of America stress the importance of following such written procedures to their member companies.

Single copies of the letter reports (Safety Recommendations P-76-27 through 29 and P-76-26) may be obtained by directing a request to Publications Branch, BGM-222, National Transportation Safety Board, Washington, D.C. 20594, telephone (202) 426-8169.

Relates to 49 CFR, §192.11

INTERPRETATION OF REGULATIONS

Question: Under Section 192.11, what constitutes a petroleum gas system?

OPSO Interpretation:..."For the purpose of Section 192.11(a), a 'system' normally consists of a tank storing petroleum gas in liquid form and the appurtenant pipelines and other facilities used by the operator of the system to deliver gas to one or more customers."

Cesar DeLeon
Acting Director
Office of Pipeline
Safety Operations

The Secretary of Transportation has determined that publication of this periodical is necessary in the transaction of the public business required by law of this Department. Use of funds for printing this periodical has been approved by the Director of the Office of Management and Budget through November 30, 1976.