

September 17, 1980

Interpretation of 195.404(b)

Melvin A. Judah
Acting Associate Director for
Pipeline Safety Regulation, DMT-30

Edward J. Onadak
Chief, Central Region, DMT-14

Your memo dated May 21, 1980, requested an interpretation of section 195.404(b) concerning the required frequency of recording pipeline pressures.

The attached interpretation gives the information you requested.

Attachment

No. 80-14
Date: September 17, 1980

DEPARTMENT OF TRANSPORTATION
RESEARCH AND SPECIAL PROGRAMS ADMINISTRATION
MATERIALS TRANSPORTATION BUREAU

PIPELINE SAFETY REGULATORY INTERPRETATION

No
te: A pipeline safety regulatory interpretation applies a particular rule to a particular set of facts and circumstances, and, as such, may be relied upon only by those persons to whom the interpretation is specifically addressed.

SECTION: 195.404(b)

SUBJECT: Frequency of recorded pressures prescribed by
?195.404(b)

FACTS: As given by memo dated May 21, 1980, from Chief, Central Region, DMT-14, to Associate Director for Pipeline Safety Regulation (DMT-30):

" . . . an operator utilizes a system by which the pump station pressures are automatically logged on a printout every 30 minutes. . . "

Questions: (1) Does this system meet the requirements of
?195.404(b)?

(2) Is continuous recording of discharge pressures required by ?195.404(b)?

Interpretation: The intent of the rule is to record pipeline pressures in sufficient detail to reveal the operating conditions at the time the records were made. Since pipeline pressures usually do not change rapidly, 30-minute intervals to record the pressures are adequate to meet the intent of the rule.

Continuous pressure recording is not required nor is it possible in most cases. Most equipment which monitors pressures "continuously," in fact gives intermittent electrical pulses which actuate the pressure indicator. As a result, the records are not

truly continuous nor would there be any apparent advantage in having continuous pressure records.

Melvin A. Judah
Acting Associate Director for
Pipeline Safety Regulation
Materials Transportation Bureau