

PI-85-0100

U.S. Department of Transportation
Research and Special Programs Administration

Materials Transportation Bureau
555 Zang Street
Lakewood, Colorado 80228

January 17, 1985

Mr. Mike Olson
San Diego Gas and Electric
101 Ash
San Diego, CA 92112

Dear Mr. Olson:

This responds to your inquiry to Mr. Cesar De Leon of our office regarding your request concerning the possible deactivation of the SDG&E LNG plant. You inquired how you could deactivate the plant, and still retain the grandfather clause for the plant so that it can be brought back into operation without having to meet the current LNG design and construction requirements.

From a review of Section 193.2005(b), a facility constructed in the 1960's, would not have to comply with the applicable requirements of Part 193 governing siting, design, installation and construction unless the facility is replaced, relocated, or significantly altered. Other sections of Part 193 which are pertinent are:

1. Section 193.2603(b) states that an operator may not return to service any component which is not maintained in accordance with Subpart G.
2. Section 193.2619(b) states that a control system which out of service for 30 days or more must be inspected and tested for operational capacity before returning it to service.

I trust that this clarifies this matter.

Sincerely,
Jack C. Overly
Chief
Western Region Pipeline Safety
Office of Operations and Enforcement