

U.S. Department
of Transportation

400 Seventh Street, SW
Washington, DC 20590

**Research and
Special Programs
Administration**

September 12, 1995

Mr. Richard Buckley-Correa
Hoechst Celanese Corporation
1601 West LBJ Freeway
P.O. Box 819005
Dallas, TX 75381-9005

Dear Mr. Buckley-Correa:

This responds to your letter of July 19, 1995, to Cesar DeLeon, Deputy Associate Administrator, Office of Pipeline Safety, regarding the hazardous liquid pipeline safety regulations (49 CFR Part 195). You want to know if we consider the definition of "petroleum product" to include liquids besides those that are produced by separating crude petroleum.

In Part 195, "petroleum product" means flammable, toxic, or corrosive products obtained from distilling and processing of crude oil, unfinished oils, natural gas liquids, blend stocks and other miscellaneous hydrocarbon compounds (§195.2). Under this definition, any flammable, toxic, or corrosive liquid that is produced by distilling or processing hydrocarbon compounds is a petroleum product and, thus, a hazardous liquid under Part 195. Petroleum products are not limited, as you suggest, to refinery products produced by crude oil distillation or cracking. They also include petrochemicals produced from other hydrocarbons, including natural gas, natural gas liquids, coal, coal tar, or charcoal.

You also asked if we consider ethylene glycol and formic acid to be hazardous liquids under Part 195. Since these liquids have a hydrocarbon base and are, respectively, flammable and corrosive products under the definitions in §195.2, we consider them to be petroleum products and hazardous liquids under Part 195.

I hope you find this information helpful. Please let me know if you have any further questions about the hazardous liquid pipeline safety regulations.

Sincerely,

Richard D. Huriaux, P.E.
Director for Technology and Regulations
Office of Pipeline Safety