

February 15, 1996

Ms. Nancy Wolfe
Chief, Pipeline Safety and Enforcement
Office of the State Fire Marshall
California Department of Forestry and Fire Protection
Suite 600
7171 Bowling Drive
Sacramento CA 95823-2034

Dear Ms. Wolfe:

We have considered your letter of January 25, 1996, submitted under 49 CFR 190.9, concerning a request by the ARCO Pipe Line Company for an administrative finding under 49 CFR 195.120 (b) (7) . This regulation permits us to find that particular piping is impracticable to design and construct to accommodate the passage of instrumented internal inspection devices. Such a finding excludes the piping from the requirement of § 195.120 (a) that "each new pipeline and each line section of a pipeline where the line pipe, valve, fitting or other line component is replaced; [*sic*] must be designed and constructed to accommodate the passage of instrumented internal inspection devices."

ARCO's request pertains to its intrastate pipelines in the Los Angeles Basin that are not "currently capable of passing internal inspection devices using existing technology." ARCO excluded from its request crude transmission lines #63 and #90, and any pipelines it may replace or relocate. You recommended that we grant ARCO's request because present easements are inadequate for designs that would allow instrumented pigging, and additional easements are either extremely costly or unavailable. You are also concerned that rigid application of § 195.120 would cause ARCO to shift available funds away from higher priority safety-related projects.

We agree that under the circumstances presented it would be difficult for ARCO to obtain additional right-of-way to provide for instrumented pigging of a line section whenever a line component is replaced. However, to offset the reduction in safety if such right-of-way is not obtained, we believe ARCO should apply more rigorous corrosion inspections on the line sections. We, therefore, find that line sections in pipelines covered by ARCO's request are impracticable to design and construct to accommodate the passage of instrumented internal inspection devices, provided ARCO uses close-interval surveys to inspect the line sections for corrosion each time such inspections are required under 49 CFR Part 195.

Sincerely,

Richard B. Felder
Associate Administrator for Pipeline Safety