

PI-96-0100

March 4, 1996

Mr. Mike T. Deason
President
Americas Marketing Group, Inc.
P. O. Box 100849
Birmingham, Alabama 35210

Dear Mr. Deason:

This is in response to your recent letters, in which you requested an interpretation of 49 CFR §192.145, in regards to testing valves. As you noted in your letter, Section 192.145 requires that valves meet the minimum requirements, or equivalent, of API 6D.

According to your letter, in your conversation with the American Petroleum Institute you were told that there was no accepted equivalent to the hydrostatic test listed in API-6D. You also indicated that you were unable to get written statements from the American National Standards Institute (ANSI) and the Manufacturers Standardization Society (MSS) that the testing requirements for valves in their standards were equivalent to API 6D standard. This lead you to conclude that there were no equivalent testing requirements to API 6D. Therefore, you requested interpretation of "or equivalent" in Section 192.145, and request that we advise you of an equivalent to the hydrostatic test.

Published standards do not cover all types and sizes of valves that are manufactured. However, there are certain basic safety features that can be applied to all valves. In Section 192.145, the word "or equivalent" is used in the sense of accepting another standard that provides an equivalent level of safety to API 6D, including quality control and inspection to API 6D. The term "or equivalent" is not necessarily used with regard to hydrostatic or air test or any other specific features of industry standards. Other nationally recognized testing and valve standards such as API 598, Valve Inspection and Testing, API 608, Metal Ball Valves - Flanged and Butt-weld Ends, and MSS-SP-61, Pressure Testing of Steel Valves, allow the use of air as the test medium. In addition, we have enclosed a copy of Technical Report NE-169, "Weldball Valve Leakage Analysis, Air versus Water" supplied by Kerotest Manufacturing Corporation, that may help you in identifying equivalent standards, such as ISO 5208 that is referenced in the report.

By not restricting minimum requirements to meet only API 6D standard, we are, in fact encouraging new developments in manufacturing and testing of valves, due to the changes in technology.

We trust that this interpretation will answer any question you might have.

Sincerely,
Richard B. Felder
Associate Administrator
for Pipeline Safety

State of Florida
Public Service Commission
Capital Circle Office Center
2540 Shumard Oak BLVD
Tallahassee, FL 32399-0850

February 28, 1996

Mike T. Deason, President
Americas Marketing Group, Inc.
& M. T. Deason Company, Inc.
P.O. Box 100849
Birmingham, Alabama 35210

Re: **Information Request Regarding Code of Federal Regulations, 192.145 Valves**

Dear Mr. Deason:

The Commission has a rule, 25-12.028, Florida Administrative Code, requiring the marking of materials used in natural gas pipelines. This rule states that each valve must be clearly marked as prescribed in the specification or standard, to which it was manufactured.

The Code of Federal Regulations (CFR), Part 192.145 Valves, requires valves to meet the minimum requirements of the American Petroleum Institute (API), Specification 6D, "Specification for pipeline Valves (Gate, Plug, Ball, and Check Valves)" (20th edition, 1991). Hydrostatic pressure testing of valves is the minimum required by API 6D. The American Petroleum Institute has recently reaffirmed its minimum hydrostatic testing requirements for valves to the natural gas industry.

Florida law requires valves to be marked, using the specification of the standard by which they are manufactured, and API 6D is the only approved standard at this time. This may change if the United States Department of Transportation or the American Petroleum Institute are forthcoming with additional information.

If you have any further questions, contact me at (904) 413-6650.

Respectfully,
C. Edward Mills, Supervisor
Engineering and Safety
Bureau of Gas Regulation

Americas Marketing Group, Inc.
P.O Box 100849
Birmingham, Alabama 35210

February 26, 1996

Mr. Cesar De Leon
U.S. Department of Transportation
RSPA/Office of Pipeline Safety
400 7th Street SW
Washington, DC 20590

Reference: 192.145 Valves, API-6D or "equivalent". Dear Mr, De Leon:

I hope at the writing of this letter that you have received the copy of ISO 5208 (International Standard for Testing Industrial Valves) that I mailed you on February 15, 1996. Please find a letter enclosed that I received from Mr. J.D. Greer, Senior E&P Associate with the American Petroleum Institute. Mr. Greer confirms in this letter that API-6D specification requires hydrostatic shell testing for steel valves and has no provisions for air testing in lieu of the hydrostatic test.

In my telephone conversation with you on February 15, 1996, you discussed with me the ISO test. I committed during our conversation to provide you with the ISO 5208 test you made reference to. The ISO 5208 standard has provisions for testing with a fluid listed under section 2.2 and 2.2.1 on page one. I also refer you to 4.1.1 and 4.1.2 of the standard that requires testing with a fluid having the velocity not greater than that of water.

Broen, manufacturer of the **BALLOMAX** steel ball valves, interprets 192.145 of the Code of Federal Regulations, that each valve must meet the minimum requirements, or "equivalent" of API-6D standard for testing valves. Therefore, the American Petroleum Institute has clearly defined there is no equivalent for air testing. Also, the ISO 5208 test has provisions for hydrostatically testing valves.

The interpretation we, Americas Marketing Group Inc., representing Broen, are requesting relates to air testing of valves under 192.145 of the Code of Federal Regulations. In my opinion, the interpretation of this section of the code must come from Mr. Richard B. Felder, Associate Administrator, U.S. Department of Transportation, Office of Pipeline Safety, 400 Seventh St. S.W. Room 2335, Washington, D.C., 20590.

To date no one with this agency has had the courtesy to respond to any of our request for an interpretation in writing. Our company is experiencing a price disadvantage in regards to manufacturers testing with air. Your delay and non-response has cost our company sales. Our company meets the requirements and test procedures under API-6D. In the event of an accident, what ruling or interpretation would DOT render in regards to "air testing" steel valves under this section of the code? In the interest of safety, how could any valve company be requested on a 900 ANSI valve, to perform a minimum air shell test to 3250 PSI? I hope you would agree the valve company would have a potential bomb.

Our company has gone through the appropriate and suggested chain of command in regards to our request for this interpretation of the code. If I receive no written response you leave me no alternative but to solicit help from my state senator.

I look forward to your written response and interpretation of what is "equivalent" to API-6D. If the air test is equivalent, please state so.

With warmest personal regards, I remain,

Yours truly,
Americas Marketing Group, Inc.
Mike T. Deason
President

American Petroleum Institute
Exploration & Production Department
1220 L Street, NW
Washington, DC 20005
Phone: (202) 682-8000
Fax: (202) 682-8426

J. D. Greer
Senior E&P Associate
Direct Line: (202) 682-8494

February 16, 1996

Mr. Mike Deason, President
Americas Marketing Group Inc.
PO Box 100849
Birmingham, AL 35210

Re: API Spec 6D, Specification for Pipeline Valves (Gate, Plug, Ball and Check Valves), 21st Edition, March 31, 1994

Dear Mr. Deason:

Per our telephone conversation today, this confirms that API Spec 6D requires hydrostatic shell testing, and has no provision for air testing in lieu of hydrostatic testing. This is clearly shown in Par. 5.1 and 5.2 of Section 5, "Tests" as shown below with underlining added for emphasis:

5.1 Pressure Tests. Each valve shall be tested as set out in this section prior to shipment from the manufacturer's works. These tests shall be performed in accordance with the manufacturer's written procedures. The manufacturer shall complete shell pressure tests before painting the valves. Tests shall be made in the sequence shown in the following paragraphs. Additional tests such as those in Appendix C may be performed by the manufacturer, after the tests in Sections 5.2 and 5.3 unless otherwise noted in Appendix C.

5.2 Shell Test. Valves shall be subjected to a hydrostatic shell test. . . .

Appendix C allows hydrostatic testing at higher pressures or for longer times than specified in Section 5.2 (Par. C2), but has no provision for air shell testing.

Sincerely,

Americas Marketing Group, Inc.
P.O. Box 100849
Birmingham, Alabama 35210

February 15, 1996

Mr. Cesar De Leon
U.S. Department of Transportation
RSPA/Office of Pipeline Safety
400 7th Street SW
Washington, DC 20590

Reference: ISO 5208

Dear Mr. De Leon:

Enclosed is a copy of the International Standard ISO 5208 for your review. Please read this and let me know if this is considered an "equivalent" referred to in 192.145. Thank you for the time and courtesy you have extended me over the phone today. I am contacting Mr. Jim Greer today with API and will keep you informed of my progress. I hope you would agree whoever wrote the word "equivalent" in the code certainly gave DOT the responsibility to interpret what is "equivalent" or the code is left to the interpretation of anyone who manufacturers valves. I have always believed the Code of Federal Regulations set standards for the natural gas industry to follow. Even though I respect your position, I totally disagree and fully believe that the interpretation of this statement must come from the Department of Transportation.

It is our opinion that all interpretations regarding code compliance and an official interpretation of the requirements of standards must come from the U.S. Department of Transportation: Office Pipeline Safety, Washington, DC, 20590.

I respectfully request your reply in writing and hope you would present this to your legal staff as mentioned over the phone.

Sincerely,
AMERICAS MARKETING GROUP, INC.
Mike T. Deason
President

Americas Marketing Group, Inc.
P.O. Box 100849
Birmingham, Alabama 35210

January 3, 1996

Mr. Cesar De Leon
U.S. Department of Transportation
RSPA/Office of Pipeline Safety
400 7th Street SW
Washington, DC 20590

Subject: Code of Federal Regulations, Title 49, Part 192, Section 192.145, Minimum Requirements for Testing
Natural Gas Valves

Dear Mr. De Leon:

I want to thank you for the courtesy you extended me yesterday over the telephone. Please find enclosed some of the correspondence with state and federal officials regarding testing of steel valves per the above code.

We, Americas Marketing Group, Inc., are the master distributor for Broen Industries for their steel **BALLOMAX** ball valve. All valves are hydrostatically tested per API 6-D which is referenced in 192.145 of the Federal Code.

Please render an interpretation of this section of the code regarding testing. Does an air test meet the requirements of this section of the code?

Our company is hydrostatically testing all valves. Some of our competitors are interpreting the code that an air test meets 192.145. Our company is at a tremendous disadvantage from a competitive situation by performing the hydrostatic test if it is not required under 192.145.

We respectfully request in writing an interpretation of this code so our company can compete in the natural gas distribution market with our competitors.

With warmest personal regards, I remain,

Yours truly,
Mike T. Deason

Americas Marketing Group, Inc.
P.O. Box 100849
Birmingham, Alabama 35210

December 21, 1995

Mr. Richard B. Felder
Associate Administrator for Pipeline Safety, DPS-1
400 7th Street, SW
Washington, DC 20590

Subject: Code of Federal Regulations, Title 49, Part 192, Section 192.145, Minimum Requirements for Testing
Natural Gas Valves

Dear Mr. Felder,

I want to thank you for the time and courtesy you extended me this morning over the telephone.

We have experienced much confusion in regards to testing of steel valves referred to in the above section of the code of Federal Regulations. The confusion surrounds the word "equivalent". I am enclosing for your review the correspondence between Americas Marketing Group, Inc. and federal and local authorities.

We, Americas Marketing Group, Inc., have been referred to you for an interpretation of the code. I know you would agree that no manufacturer of a product is in a position to interpret the code for a gas system. It is our obligation to make sure we meet or exceed the minimum requirements.

Certain manufacturers of steel valves have taken upon themselves the responsibility to inform customers that an air test is equivalent to the API 6-D hydro test. If the air test meets the Code of Federal Regulations, would you please notify us in writing so we will no longer be required to hydrostatically test each valve per API 6-D. A manufacturer required to perform the API 6-D test and mark valves accordingly is at a tremendous price disadvantage against competition only performing the air test.

It is our position that steel valves must be hydrostatically tested as specified in the standard unless you rule and give the specific interpretation of the word "equivalent". It is our opinion that the interpretation of this requirement must come from your office only.

Please accept this letter and enclosed correspondence as our genuine effort not to misinform our natural gas clients. Our sincere interest is to assist in the development of pipeline safety.

Yours truly,
John M. Webb
Sales Representative
Americas Marketing Group, Inc