

PI-98-0101

July 2, 1998

U.S. Department of Transportation

Research and Special Programs Administration

400 Seventh Street, S.W.  
Washington, DC 20590

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Subject: INFORMATION: Storage of lubricating oil in compressor buildings

From: Richard D. Huriaux, DPS-10

To: Richard Sanders, DTI-60

This responds to your e-mail of April 3, 1998, requesting a written opinion whether 49 CFR 192.735(a) applies to compressor lubricating oil. Under this regulation, "flammable or combustible materials in quantities beyond those required for everyday use, or other than those normally used in compressor buildings, must be stored a safe distance from the compressor building."

For § 192.735(a) to apply to compressor lubricating oil, the oil must be flammable or combustible. Although neither term is defined in Part 192, the ordinary meaning of flammable or combustible is to catch fire readily or burn easily. The information you furnished shows that compressor lubricating oil is hard to ignite, and so is not flammable or combustible based on the ordinary meaning. You also pointed out that compressor lubricating oil does not qualify as a flammable or combustible liquid under the more specific definitions in RSPA's hazardous materials regulations (49 CFR 173.120(a) and (b)) or in the ANSI/NFPA 30, "Flammable and Combustible Liquids Code" (paragraphs 1-7.3.1 and 1-7.3.2). Therefore, we have concluded that compressor lubricating oil is not covered by § 192.735(a).