

PI-99-0106  
U.S. Department of Transportation  
Research and Special Programs Administration  
400 Seventh Street, S.W.  
Washington, D.C. 20590

December 8, 1999

Mr. Stephen E. Gilliam  
Regulatory Administrator  
Colonial Pipeline Company  
Resurgens Plaza  
945 East Paces Ferry Road  
Atlanta, Georgia 30326

Dear Mr. Gilliam:

This is in response to your letter of November 2, 1999, in which you requested an interpretation of 49 CFR §195.302(c)(2) regarding the testing schedule for older hazardous liquid pipelines.

The best way to explain this rule is by way of two examples:

**Example (1) - Assume a 100-mile long, pre-1970 untested pipeline of which 70 miles are Electric Resistance Welded (ERW) pipe. What is an operator required to test by December 7, 2000, and by December 7, 2003?**

**Answer** - Because the 70 miles of ERW pipe is more than 50% by mileage of the pipeline, all 100 miles must be pressure tested before December 7, 2000.

**Example (2) - Assume a 300-mile, untested pre-1970 untested pipeline system. What is an operator required to test by December 7, 2000, and by December 7, 2003?**

**Answer** - If existing records show the 300-mile pipeline contains at least 50% by mileage of pre-1970 ERW pipe, the entire pipeline must be tested by December 7, 2000. If the 300-mile pipeline contains less than 50% pre-1970 ERW pipe, at least 50% of the pipeline must be tested by December 7, 2000 and the remainder must be tested by December 7, 2003.

The regulations do not define the beginning and termination points of a pipeline. The Office of Pipeline Safety (OPS) recognizes that many pipeline systems are interconnected such that individual pipelines are difficult to identify. For compliance purposes, OPS will accept an operator determination of the beginning and termination points of a pipeline when the determination is reasonable, practicable, and is based on existing documentation. Operators who designate the beginning and termination points of a pipeline to circumvent testing deadlines will be subject to compliance orders requiring testing.

For example, a typical 300-mile system may be determined to contain three individual 100-mile pipelines. Consider that one pipeline contains over 50% pre-1970 ERW pipe, the second has 40% pre-1970 ERW pipe, and the third has no ERW pipe. In accordance with the 195.302(c)(2)(i)-

(A) before December 7, 2000, a pressure test is required for the entire pipeline (100 miles) that has over 50% pre-1970 ERW pipe. Also, before December 7, 2000, a pressure test is required for at least 100 miles (total) in any portions of the second and/or third pipeline.

(B) before December 7, 2003, a pressure test is required for the remaining portions of pipeline in the second and third pipelines.

If we can be of further assistance in this matter, please contact me at (202) 366-4565.

Sincerely,  
Richard D. Huriaux, P.E.  
Manager, Regulations  
Office of Pipeline Safety

Colonial Pipeline Company  
Resurgens Plaza  
945 East Paces Ferry Road  
Atlanta, Georgia 30326

November 2, 1999

Mr. Richard B. Felder  
Associate Administrator  
U.S. Department of Transportation  
Office of Pipeline Safety  
400 7<sup>th</sup> Street, S.W. Room 7128  
Washington, DC 20590

Dear Mr. Felder:

Colonial Pipeline Company requests a written interpretation of Part 195.302 (c)(2): For pipelines scheduled for testing each operator shall —

- (i) Before December 7, 2000, pressure test —
  - (A) Each pipeline identified by name, symbol, or otherwise that existing records show contains more than 50 percent by mileage (length) of electric resistance welded pipe manufactured before 1970, and
  - (B) At least 50 percent of the mileage (length) of all other pipelines; and
- (ii) Before December 7, 2003, pressure test the remainder of the pipeline mileage (length).

We have had verbal discussions with Mr. Mike Israni regarding this rule and would like to make sure we understand the intent of the code and insure we test the sections of pipe by the required date.

Sincerely,  
Stephen E. Gilliam