U.S. Department
of Transportation

**Pipeline and Hazardous
Materials Safety
Administration**

1200 New Jersey Avenue, SE
Washington, D.C. 20590

FEB 10 2016

Mr. Don A. Ledversis
Pipeline Safety Engineer
Rhode Island Division of Public Utilities & Carriers
89 Jefferson Blvd
Warwick, RI 02888

Dear Mr. Ledversis:

In a letter to the Pipeline and Hazardous Materials Safety Administration (PHMSA) dated September 10, 2015, you requested an interpretation of 49 CFR Part 192. Specifically, you asked whether a service line without an excess flow valve, which is damaged by excavation activity, must be replaced with an excess flow valve under the requirement of § 192.381(d).

Section 192.383(b) discusses the requirements for excess flow valve installation, as follows:

> **§ 192.383 Excess flow valve installation.**
> (b) Installation required. An excess flow valve (EFV) installation must comply with the performance standards in § 192.381. The operator must install an EFV on any new or replaced service line serving a single-family residence after February 12, 2010, unless one or more of the following conditions is present:
> (1) The service line does not operate at a pressure of 10 psig or greater throughout the year;
> (2) The operator has prior experience with contaminants in the gas stream that could interfere with the EFV's operation or cause loss of service to a residence;
> (3) An EFV could interfere with necessary operation or maintenance activities, such as blowing liquids from the line; or
> (4) An EFV meeting performance standards in § 192.381 is not commercially available to the operator.

Where none of the conditions listed in § 192.383(b) are present, as discussed in your letter, a replaced service line may require the installation of an excess flow valve. A replaced service line is defined, under § 192.383(a), as "a gas service line where the fitting that connects the service line to the main is replaced or the piping connected to this fitting is replaced." Furthermore, pursuant to § 192.383(b), the installation of an excess flow valve must comply with the performance standards in § 192.381, including § 192.381(b) which states "An operator shall locate an excess flow valve as near as practical to the fitting connecting the service line to its source of gas supply."

We agree with your understanding that if an excess flow valve is installed, it should be placed as near to the source of gas supply as practical to ensure the excess flow valve protects the maximum length of service line. An excess flow valve is required if the service line from the main to the customer's house, or a segment of service line near the fitting connecting the main to the service line (where an excess flow valve is usually located), is replaced. However, an excess flow valve is not required for replacement of short segments of service line far away from the main or source of supply because excess flow valves in those locations may not provide excavation-damage protection.

If we can be of further assistance, please contact Tewabe Asebe at 202-366-5523.

Sincerely,

John A. Gale
Director, Office of Standards
and Rulemaking

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

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Mr. John Gale
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September 10, 2015

Re: Request for Letter of Interpretation

The Rhode Island Division of Public Utilities and Carriers (RIDPUC) requests an interpretation of The Pipeline Safety Regulations 49 CFR Part 192.381(d) Service Lines: Excess flow valve performance standards which states,

> *(d) An operator shall locate an excess flow valve as near as practical to the fitting connecting the service line to its source of gas supply.*

Our interpretation relates to the particular situation where a gas service line that did not originally have an excess flow installed on it is required to be repaired due to excavation activities damaging the line requiring a section to be cut out and replaced with a new piece of pipe. In the particular case where the gas service line did not originally have an excess flow valve installed the operator is therefore required to install an excess flow valve if all the criteria are met as described in 49 CFR Part 192.383(b)(1-4) Excess flow valve installation which states,

> *An excess flow valve must be installed on any new or replaced service line serving a single-family residence after February 12, 2010, unless one or more of the following conditions is present: (1) The service line does not operate at a pressure of 10 psig or greater throughout the year; (2) The*

> *operator has prior experience with contaminants in the gas stream that could interfere with the EFV's operation or cause loss of service to a residence; (3) An EFV could interfere with necessary operation or maintenance activities, such as blowing liquids from the line; or (4) An EFV meeting performance standards in §192.381 is not commercially available to the operator.*

Assuming all the criteria above is met the operator would be required to install an excess flow valve to the repaired service line since the cut out pipe section meets the definition of a *Replaced service line* as defined in 49 CFR Part 192.383(a) Excess flow valve installation which states,

> *Replaced service line means a gas service line where the fitting that connects the service line to the main is replaced or the piping connected to this fitting is replaced.*

At this point the operator is required to install the excess flow valve to meet compliance with Part 192.381(d) Service Lines: Excess flow valve performance standards. The Division interprets Part 192.381(d) as requiring the installation of the excess flow valve at the main in close proximity to the fitting connecting the service line to its source of gas supply and not at the point of the excavation damage. For example if the repair is made only several feet from the foundation wall of the residence the installation of an excess flow valve in such close proximity to the foundation wall would provide very little safety for future excavation activity. The misinterpretation of the word “practical” and the installation the excess flow valve at the point of the excavation damage as a quick fix undermines the true safety benefits of the excess flow valve. Excess flow valves can provide protection to the gas customer properties from the consequences of a break in the service line.

The Division requests a *Letter of Interpretation* from PHMSA regarding the above issue.

Don A. Ledversis
Pipeline Safety Engineer
Rhode Island Division of Public Utilities & Carriers

CC: Thomas Ahern, Administrator, RIDPUC
James Lanni, Associate Administrator of Operations and Consumer Affairs, RIDPUC