

Mr. Oliver J. Semmes, Jr.
City Engineer
City of Gulf Breeze
P. O. Box 640
Gulf Breeze, Florida 32561

Dear Mr. Semmes:

This is in reply to your letter of November 6, 1970, requesting an explanation of the relationship between Sections 192.619 and 192.621, of 40 CFR.

Section 192.619 establishes a maximum allowable operating pressure for all steel and plastic pipelines. The requirements of Section 192.621 are additional requirements which apply to high-pressure distribution systems, defined in Section 192.3 as those systems in which the gas pressure in the main is higher than the pressure provided to the customer.

Therefore, the two sections in question do not conflict. Both sections must be complied with when operating high-pressure distribution systems in order to establish a maximum allowable operating pressure.

You are correct in your view that if your line has not been operated at the new increased pressure during the five years preceding July 1, 1970, you must follow the uprating or testing procedures required by Part 192.

Thank you for your interest in pipeline safety.

Sincerely,

/signed/

Joseph C. Caldwell
Director, Acting
Office of Pipeline Safety