

PI-70-0105

September 29, 1970

Mr. George W. White  
Vice President  
Tennessee Gas Pipeline Co.  
P.O. Box 2511  
Houston, Texas 77001

Dear Mr. White:

This is in reply to your letter concerning the application of section 192.167 (a)(4)(ii), of Title 49, Code of Federal Regulations.

It is our interpretation, that the regulation does not forbid your practice of placing one emergency shutdown location close to the portion of a compressor station most likely to be occupied, provided that there are also two places of operation that are near the exit gates in the station fence.

The regulations contained in Part 192 are minimum standards and are not intended in any way to limit practices which go beyond them in the interest of safety.

You may wish to raise this question at the meeting of the Technical Pipeline Safety Standards Committee schedules for October 29, 1970, at which the proposed agenda will include possible changes to the standards.

Thank you for your interest in pipeline standards.  
Thank you for your interest in pipeline safety.

Sincerely,  
Original signed by;  
Joseph C. Caldwell  
Director, Acting  
Office of Pipeline Safety

Tennessee Gas Pipeline Company  
P.O. Box 2511  
Houston, Texas 77001

September 17, 1970

Mr. Joseph C. Caldwell  
Acting Director  
Office of Pipeline Safety  
Department of Transportation  
400 6th Street, SW  
Washington, D.C. 20590

Subject: Suggested Change to Section 192.167, Subpart D, Minimum Federal Safety Standards for Gas Pipelines.

Dear Joe:

It has been brought to my attention that many of the advisory provisions of 843.431 of the B31.8 Code concerning compressor station emergency shut-down facilities were carried over into Section 192.67 of the Federal Regulations with the language changed to make these provisions mandatory. It is not appropriate that one of these should be mandatory in the sense that it is contained in the Regulation, specifically 192.167 (4)(ii). This provision requires that both emergency shut-down stations be located near exit gates in the station fence. It is our policy, and has been many years, to place one emergency shut-down location a considerable distance from the compressor facilities and in the vicinity of an exit gate, but the other is placed near a building or room that is most likely to be occupied. This will give the operator almost immediate access to the emergency shut-down location.

I believe this situation can be rectified very simply by eliminating this provision from Subsection (4) and either not mentioning proximity to gates at all or adding a Subsection (5) which would state that one of the emergency shut-down stations should be placed in the vicinity of an exit gate.

I do not believe that this revision would necessarily require the approval of the Technical Committee.

Yours very truly,  
George W. White  
Vice President