

PI-70-0112

December 29, 1970

Mr. Giles M. Crabtree, Product Engineer  
American Meter Company  
13500 Philmont Avenue  
Philadelphia, Pennsylvania 19116

Dear Mr. Crabtree:

This refers to your letters of November 16 and December 8, 1970 to Mr, Frank Fulton of the Office of Pipeline Safety of this Department, concerning needle valves manufactured by your company. Because liquid pipelines engaged in interstate commerce are under jurisdiction of the Federal Railroad Administration, your letters were referred to this Bureau for reply.

A review has been made of your Bulletin 420.2 in which the needle valves in question are described. It is noted that the valves are used for pipe sizes 1/8" through 1/2" on measurement gages and various control mechanisms. Obviously, valves of those sizes would be external to main line pipe, and would not be used to control the flow of a product moving in interstate commerce. Therefore, the provisions of Section 195.116 of the regulations governing the transportation of liquids by pipeline do not apply to valves as described in Bulletin 420.2

Sincerely yours,  
Mac E. Rogers  
Director  
Bureau of Railroad Safety

December 10, 1970

TSA-30

Request for Interpretation of  
Section 195.116 to Answer Inquiry  
Submitted by American Meter Company

Acting Director  
Office of Pipeline Safety

Director, Bureau of Railroad Safety  
Federal Railroad Administration

Attached is a letter from Mr. Giles M. Crabtree, American Meter Company, dated November 16, 1970. Mr. Crabtree is questioning the applicability of Section 195.116 to needle valves manufactured by the American Meter Company. A copy of my response to Mr. Crabtree is also attached.

I believe the best way to respond to Mr. Crabtree is to render an interpretation to the section involved. I would appreciate it if your Office would proceed in this direction and respond to Mr. Crabtree directly.

My Office has already reviewed Mr. Crabtree's letter and the American Meter Company's Bulletin 420.2, attached to his letter. Valves of the size and type described in Bulletin 420.2 are not normally used to regulate the flow of hazardous commodities moving in transportation, but rather are installed to measure such flow. It is therefore doubtful that these valves would be included within the definition of "pipeline system" contained in Part 195.

I would appreciate a copy of your reply to Mr. Crabtree.

Signed  
Joseph C. Caldwell

December 8, 1970

American Meter Company  
13500 Philmont Avenue  
Philadelphia, Pennsylvania 19116

Mr. Frank Fulton, Chief Technical Officer  
Pipeline Safety Division  
Hazardous Materials Regulations Board  
U.S. Department of Transportation  
Washington, D.C. 20590

Dear Mr. Fulton:

This is a follow-up on my letter of November 16, to which I have received no response. (A reference copy is attached.)

I would appreciate having your judgment on the application of D.O.T. Title 49, part 195, to our needle valve product line as soon as possible. Thank you.

Very truly yours,  
Giles M. Crabtree  
Product Engineer

November 16, 1970

American Meter Company  
13500 Philmont Avenue  
Philadelphia, Pennsylvania 19116

November 16, 1970

Mr. Frank Fulton, Chief Technical Officer

Pipeline Safety Division  
Hazardous Materials Regulations Board  
U.S. Department of Transportation  
Washington, D.C. 20590

Dear Mr. Fulton:

We have been asked if our needle valve product line complies with D.O.T. Title 49, part 195. In reviewing section 195.116, it appears we do not meet the requirements of e (position indicator) and f3, f4 (material and size marking).

We would like to question whether these requirements are applicable to our needle valve products since position indicators are rarely, if ever, incorporated in this valve type.

The valves in question are used on pipeline systems in pressure sensing lines for flow and pressure measurement devices. Attached is a copy of our bulletin 420.2 describing the needle valves.

We would appreciate having your opinion as quickly as possible.

Very truly yours,  
Giles M. Crabtree  
Product Engineer

December 8, 1970

Mr. Giles M. Crabtree  
Product Engineer  
American Meter Company  
13500 Philmont Avenue  
Philadelphia, Pennsylvania 19116

Dear Mr. Crabtree;

This is in answer to your letter of November 16, 1970, requesting our opinion as to the applicability of Section 195.116 to needle valves manufactured by the American Meter Company.

The Federal Railroad Administration exercises statutory responsibility over the safety of liquid pipelines and administers the safety regulations contained in Part 195.

I am forwarding your letter to the Director, Bureau of Railroad Safety, Federal Railroad Administration, requesting an interpretation of the regulations in order to answer your specific questions. Either the Director or myself will respond to you after an interpretation has been made.

Sincerely,  
Joseph C. Caldwell  
Director, Acting  
Office of Pipeline Safety