

February 9, 1971

Mr. S. Stapleton
Chief of Bureau of Biguefied
Petroleum Gas
Treasurer's Office State of Fla.
Tallahassee, Florida 32304

Dear Mr. Stapleton:

This is in reply to Mr. Gresimer's letter of December 28, 1970, concerning the requirements of 49 CFR, Part 192 as applied to liquid petroleum gas distribution system.

During the rulemaking process which resulted in the issuance of Part 192 representations on behalf of the LP gas industry similar to those contained in your letter were made to this Office by the trade association representing that industry, both in writing and orally.

The trade association was formally requested to provide us with factual information supporting its claim that the regulations should apply only to companies of larger size than those regulated under Part 192. No such information has been provided and, without it we have no basis for considering a change in our rules.

The regulations concerning the reporting of accidents apply to the smaller systems with 10 or more customers to the same degree that they apply to the larger ones.

Thank you for your interest in the pipeline safety program.

Sincerely,

Joseph C. Caldwell
Director, Acting
Office of Pipeline Safety