

Mr. W. E. Mickelson
Chief Engineer-Gas Operations
Central Telephone & Utilities Corp
P. O. Box 82888
Lincoln, Nebraska 68501

Dear Mr. Mickelson:

This is in reply to your request for an interpretation of 49 CFR, Section 192.511 and Section 192.513.

You are correct that Section 192.511 does not apply to plastic lines.

Section 192.3 was intended to use the word "pipeline" in its broadest sense, that is all parts of those physical facilities through which gas moves in transportation. It therefore includes service lines.

Therefore, it is the intention of the regulations that Section 192.513 apply to all plastic lines, whether they be transmission, mains or service lines.

The requirements for testing plastic are higher particularly for intended higher operating pressures than those for steel because the design specifications for plastic are much less detailed.

We hope that this answers your question. If you have any further questions, please let us know.

Sincerely,

/signed/

Joseph C. Caldwell
Director, Acting
Office of Pipeline Safety