

Mr. W. D. Malmstedt
American Insurance Association
85 John Street
New York, New York, 10038

Dear Mr. Malmstedt:

Please refer to you letter of May 6, 1971, Office of Pipeline Safety reply of June 14, 1971, and your return letter of June 29, 1971, concerning the requirements of Paragraph 192.197(a)(1) through (6).

In your letter of June 29, 1971, you ask the specific question, "Does the regulation allow the installation of gas pressure regulators without either an internal relief valve or internal safety shutoff with manual reset where the distribution system supply to the regulator is 60 psig or less?" The answer is yes, the regulations as they now stand permit the installation of service regulators without either an internal relief valve or internal safety shutoff with manual reset where the distribution system supply to the regulator is 60 psig or less.

In drafting the original proposals for Part 192, we was pointed out in the preamble to that document, OPS used as its sources the best of the laws then in effect in the various states. There were then no requirements for internal relief valves or automatic overpressure cutoffs on service regulators supplying customers from systems operating at 60 psig or less. In compiling data and analyzing the leak and annual reports, this is one of many areas we are giving consideration to. However, thus far, there has been no indication for any reason for changing the requirement.

We hope this answers your question. If there are any further questions, please let us know.

Sincerely,

/signed/

Joseph C. Caldwell
Acting Director
Office of Pipeline Safety