

Mr. Ray C. Colby
Staff Engineer
Florida Gas Company
P.O. Box 44
Winter Park, Florida 32790

Dear Mr. Colby:

In response to your letter of June 21, 1971, concerning the requirements of Title 49 CFR, Part 192, Subpart H, Section 192.365, Service Lines: Location of valves, we offer the following background information.

The proposal of rulemaking for Part 192 was developed from the regulations that were in effect in the various states on August 12, 1968. This as in most states one of the editions of USAS B31.8, with some states having more stringent requirements in some areas. The requirements of §192.365 were developed from these sources plus an evaluation of the comments received on the Notice of Proposed Rulemaking.

In developing §192.365, a valve located at the property line was considered as a possible service line valve and was considered as acceptable. However, the above-ground valve at the meter set was also considered appropriate and depending on the circumstances, just as safe. In some cases the above-ground valve may be safer in that in emergencies the above-ground valve could be operated by firemen and police with an ordinary wrench while they may not have the necessary T-wrench to turn off the underground valve. In other cases an above-ground valve may be damaged or made inaccessible by the circumstances. The many comments that were received on this subject did not favor one location over the other, but rather considered to know what is the safest for their situation.

The only change that was made on this paragraph on the final rule compared to the Notice was the addition of four words in (b) "that, if feasible, is." These words were added since the comments pointed out that in some cases it was not practical to install the valve outside the building.

At the present time the Florida Public Service Commission is the only agency in Florida that is authorized to act in safety regulation and to establish safety requirements for natural gas pipelines in addition to those that we have established as a minimum.

We hope that this gives you the background you requested. If you have any additional questions, do not hesitate to ask.

Sincerely,

/signed/
Joseph C. Caldwell, Director